

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

MIKE WORONKO, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.:

Hon.

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Mike Woronko, on behalf of himself and all others similarly situated, by and through his undersigned counsel, brings this action against General Motors LLC. For his Complaint, Plaintiff alleges the following based on personal knowledge as to his own acts and on the investigation conducted by counsel as to all other allegations:

SUMMARY OF THE ACTION

1. Plaintiff brings common law warranty claims and claims under the Magnuson-Moss Warranty Act, 15 U.S.C. §§ 2301, *et seq.* and the Michigan Consumer Protection Act, (“MCPA”), Michigan Comp. Laws Ann., § 445.903, *et seq.*, against Defendant General Motors LLC (“GM”).
2. This action arises from the sale or lease of thousands of 2015 – 2016 Chevrolet Colorado and GMC Canyon vehicles throughout Michigan and the United

States manufactured by Defendant GM that are equipped with a defective electrical connection within the torque-sensor harness connector that cause the vehicles to lose power steering while driving under a variety of conditions. The defect manifests with a significant and abrupt reduction of the power steering assist that makes turning of the steering wheel difficult. (“**the Power Steering Assist defect**” or “**the defect**”) as indicated below.

3. The defect affects model year 2015 through 2016 Chevrolet Colorado and GMC Canyon vehicles sold or leased to consumers in the United States, including Plaintiff’s vehicle (the “**Class Vehicles**”). All Class Vehicles share the same dangerously defective condition that GM failed to disclose to Plaintiff, consumers, and each Class Member. General Motors previously recalled model year 2015 Chevrolet Colorado and GMC Canyon vehicles manufactured January 6, 2015, to March 17, 2015, stating that a poor electrical connection within the steering gear connector may cause a loss of power steering assist. *See* <https://www.safercar.gov/vehicle/2015/CHEVROLET/COLORADO/PU%25252FCC/4WD#recalls> (last accessed Oct. 28, 2019) (Exhibit 1). General Motors has not disclosed the existence of the defect in model year 2015 and 2016 Chevrolet Colorado and GMC Canyon vehicles manufactured before January 6, 2015 or after March 17, 2015.

4. Plaintiff and Class Members purchased GM vehicles fitted with a

defective steering gear torque sensor cover assembly that causes them to abruptly lose the power steering assist. This is a major safety concern because drivers have reported that the defect can cause a loss of control that may require a restart to temporarily ameliorate the issue.

5. GM sold, leased, and continues to sell and lease the Class Vehicles despite its awareness of the defect. GM chose and continues to choose financial gain at the expense of consumers by concealing and omitting a disclosure of this critical powertrain component and potential safety hazard to consumers who purchase or lease Class Vehicles.

6. Despite its knowledge, GM has failed to recall the inherently dangerous electronic power steering assist torque sensor or reimburse vehicle owners for the inevitable failure of this critical part.

7. Plaintiff and Class Members have suffered harm because of GM's decision not to disclose the defect by overpaying for their vehicles and by paying significant sums for GM to attempt, and fail, to properly diagnose and repair their vehicles that exhibit the Power Steering Assist defect.

8. GM has long known of the defect and that the Class Vehicles' electronic power steering assist torque sensor is not fit for its intended purpose, as detailed at length in the factual background section below.

9. GM actively concealed and/or failed to notify an adequate number of

the affected public of the existence and nature of the defect and of the safety hazard created by the defect. GM has failed to recall the Class Vehicle to replace the steering gear torque sensor cover assembly; it has not offered to replace the steering gear torque sensor cover assembly to its customers not included in the recall free of charge; and it has not offered to reimburse owners, present or past, who have incurred costs relating to diagnosing and repairing issues arising from the Power Steering Assist defect. GM's conduct violates well-established consumer protection laws in Michigan and constitutes a continuous breach of its warranties to Plaintiff and consumers in the United States.

10. Plaintiff brings this action on behalf of himself and all those similarly situated ("Class," "Class Members," "Consumers," "Owners") for GM's breach of its warranties across the United States and GM's deceptive trade practices in violation of the consumer protection laws of Michigan.

11. On behalf of the Class Members he seeks to represent, Plaintiff seeks an award of damages in excess of \$5,000,000, including the costs of inspecting and replacing the defective electronic steering gear torque sensor cover assembly and equitable relief, including an order requiring GM to adequately disclose and repair the defect. Furthermore, Plaintiff seeks damages, injunctive and declaratory relief, restitution, disgorgement of profits, attorneys' fees and costs, punitive damages, and the repair of, replacement of, or refund of money paid to own or lease all Class

Vehicles in Michigan.

PARTIES

12. Plaintiff Mike Woronko is a citizen and resident of Kent County, Michigan.

13. Defendant General Motors LLC is a Delaware limited liability company with its principal place of business at 300 Renaissance Center, Detroit, Michigan 48243. Defendant designs, manufactures, and sells automobiles throughout the United States, including in the State of Michigan, under the brand names Chevrolet, GMC, and Cadillac. GM does business in Michigan, advertising, distributing, and selling its vehicles through its dealer network and other outlets in the State.

JURISDICTION AND VENUE

14. This action is properly before this Court and this Court has subject matter jurisdiction over this action under the Class Action Fairness Act. At least one member of the proposed class is a citizen of a different state from GM, the number of proposed Class Members exceeds 100, and the amount in controversy exceeds the sum or value of \$5,000,000.00 exclusive of interests and costs. 28 U.S.C. § 1332(d)(2)(A).

15. This Court has personal jurisdiction over GM because GM is headquartered in Michigan and has purposefully availed itself of the privilege of

conducting business activities in the State of Michigan.

16. Venue is proper in this District, pursuant to 28 U.S.C. § 1391, because GM's corporate headquarters is located in Detroit, MI, a substantial part of the acts or omissions giving rise to the claims brought herein occurred or emanated within this District, and GM has caused harm to Plaintiff and Class members residing in this District. Moreover, GM has marketed, advertised, sold, and leased the Class Vehicles within this District.

FACTUAL BACKGROUND AND SUBSTANTIVE ALLEGATIONS

17. GM manufactures, markets, distributes, and warrants automobiles in the United States sold under various brand names, including the Chevrolet brand. This lawsuit concerns model year 2015 through 2016 Chevy Colorado and GMC Canyon vehicles sold or leased to consumers in the United States, including Plaintiff's vehicle (the "**Class Vehicles**").

THE DEFECT

18. GM, through its dealerships, employees, agents, and servants, failed to disclose to Class Members and the public that the Class Vehicles contain defective electronic power steering assist torque sensor that renders the vehicles not fit for their intended purpose. This omission allowed Defendant GM to place the Class Vehicles in commerce and profit from their sales. However, GM knew from the time of manufacture that the electronic power steering assist torque sensor contained a

dangerous, inherent defect from the point of manufacture that caused the Class Vehicles to exhibit the “Power Steering Assist” defect.

19. GM’s notice of the defect derived from, among other things, GM’s own knowledge about the material, design, and manufacture of the part, feedback, both directly and through its dealers, from its customers during repairs, complaints in the National Highway Transportation Safety Administration (“NHTSA”) database, online complaints in web forums and social media that are monitored by GM, and news reports.

A. GM knew the defect through multiple consumer complaints.

20. One forum titled “Power Steering Failure” on the website <https://coloradofans.com> has dozens of complaints from GM consumers about the defect. *See* <https://www.coloradofans.com/threads/power-steering-failure.241338/> (last accessed August 1, 2019) (Exhibit 2).

21. Another forum titled “Steering Problems of Chevrolet Colorado – part 1” on the “Car Problems” website similarly has dozens of the complaints from GM consumers about the defect. *See* <http://www.carproblemzoo.com/chevrolet/colorado/steering-problems.php> (last accessed August 1, 2019) (Exhibit 3).

B. GM knew of the defect through NHTSA VOQs.

22. GM, through its dealerships, agents, servants, and employees, was also

put on actual and/or constructive notice of the Steering Power Assist defect from GM's internal customer assistance inquiry records and National Highway and Traffic Safety Administration Office of Defects Investigation (NHTSA-ODI) reports pre-dating the sale of the vehicles. The NHTSA-ODI website allows consumers to identify and report problems with vehicles, tires, equipment or car seats. *See* <https://www.safercar.gov/recalls> (last accessed August 2, 2019) (Exhibit 4) ("What happens to my complaint? Your complaint fuels our work. ... Your complaint will be added to a public NHTSA database If the agency receives similar reports from a number of people about the same product, this could indicate that a safety-related defect may exist that would warrant the opening of an investigation.").

23. The Office of Defects Investigation reviews and analyzes complaints to determine whether to issue recalls. The Vehicle Safety Complaint filing form specifically includes required fields for the name, telephone number, and email address for the complainant, and the VIN number for the vehicle (which are apparently tested by an online database). *See* <https://www-odi.safercar.gov/VehicleComplaint/> (last accessed August 2, 2019) (Exhibit 5). NHTSA-ODI does not share complainants' personal information with the general public, and a complaint is added to a public NHTSA database only after it removes all information from complaint fields that identify a complainant. *See*

<https://www.safercar.gov/recalls> (last accessed August 2, 2019) (Exhibit 6).

24. NHTSA-ODI specifically states on its website that:

Government analysts review each complaint in a timely fashion. If warranted, the Office of Defects Investigation (ODI) will open an investigation to determine if a safety defect trend exists. Some of these investigations result in safety recalls.

While you may or may not be contacted by a NHTSA-ODI investigator to clarify the information submitted, all reports are reviewed and analyzed for potential defects trends.

Thus, NHTSA-ODI complaints are made by individuals who must identify themselves and enter detailed contact information and an accurate VIN number, and these complaints are reviewed and analyzed by the federal government.

25. NHTSA-ODI reports scores of complaints consistent with the symptoms of the Steering Power Assist defect in Class Vehicles and multiple similar complaints for similar 2015 – 2016 Colorado and Canyon vehicles. These consumer complaints filed with the NHTSA are delivered to GM, reviewed by GM, and analyzed by GM's engineers. GM received and was aware of these consumer complaints. True and accurate copies of a sampling of these complaints are set forth in the paragraphs below. Combined, the reports illustrate the safety risks from the defect and that replacement parts were unavailable or backordered for consumers seeking repairs:

- TL THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING VARIOUS SPEEDS, THE TRACTION CONTROL AND STABILITY WARNING INDICATORS ILLUMINATED, WHICH

CAUSED THE STEERING TO SEIZE. THE CONTACT MANAGED TO STEER THE VEHICLE TO THE SHOULDER OF THE ROAD. WHEN THE VEHICLE WAS TURNED OFF AND RESTARTED, THE VEHICLE RESUMED NORMAL OPERATION. THE VEHICLE WAS TAKEN TO GARVIN MOTORS (1105 W COULTER AVE, POWELL, WY 82435, (307) 271-5460) WHERE IT WAS DIAGNOSED THAT THE STEERING GEAR ASSEMBLY NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND PROVIDED CASE NUMBER: 9-5365443439. THE FAILURE MILEAGE WAS APPROXIMATELY 36,400.

- TL THE CONTACT OWNS A 2015 GMC CANYON. THE CONTACT STATED THAT THE EPS WARNING INDICATOR FLASHED TO SERVICE THE POWER STEERING. THE STEERING WHEEL SEIZED BOTH TIMES AND THE VEHICLE HAD TO BE TURNED OFF AND RESTARTED. ALPENA BUICK GMC (133 JOHNSON ST, ALPENA, MI 49707, 989-884-0577) AND LAFONTAINE BUICK GMC (4000 HIGHLAND RD, HIGHLAND, MI 48357, 248-230-4821) DIAGNOSED THAT THE RACK AND PINION NEEDED TO BE REPLACED. LAFONTAINE BUICK GMC REPLACED THE PART. THE VEHICLE WAS NOT INCLUDED IN NHTSA ACTION NUMBER: RQ19001 (STEERING). THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS LESS THAN 60,000.
- THERE WAS A RECALL PREVIOUSLY 15595 ACCORDING TO GM. WHILE DRIVING POWER STEERING AND STABILITRAK GOES OUT MAKING IT VERY HARD TO STEER AND DANGEROUS, ESPECIALLY IF YOU ARE GOING AROUND A TURN. FORTUNATELY I WAS ABLE TO PULL OVER EACH TIME AND RESET THE CAR. ONCE YOU START IT, NO PROBLEM. IT GOES BACK TO NORMAL.

HOWEVER THIS HAS HAPPENED HALF A DOZEN TIMES DURING THE DEAD OF WINTER AND HAPPENED ONCE A FEW DAYS AGO WHEN WE HAD RECORD HEAT. AS I MENTIONED NO PROBLEM DRIVING TYPICALLY, WHICH

MAKES ME BELIEVE THE ISSUE IS NOT WITH THE POWER STEERING BUT WITH A FAULTY CONNECTION. I TOOK THE VEHICLE INTO THE SHOP ON MARCH 16, 2019. THEY SAID THE RECALL ITEM WAS ALREADY FIXED PREVIOUSLY. THE DIAGNOSED THAT THE STEERING GEAR AND RACK NEEDS TO BE REPLACED. I HAVE READ ONLINE SIMILAR SITUATIONS WITH OTHER OWNERS. I BELIEVE THIS IS VERY DANGEROUS AND GMC NEEDS TO REPAIR THIS. THIS WAS SOMETHING I FOUND ONLINE DESCRIBING THE ISSUE IN MORE DETAIL:

"IN THE AFFECTED VEHICLES, THE TORQUE-SENSOR HARNESS CONNECTOR WAS DAMAGED DURING FUNCTIONAL TESTING AT THE SUPPLIER. A 'STUCK' PIN ON THE STEERING GEAR SUPPLIER'S TEST DEVICE CAUSED PERMANENT DEFORMATION TO THE CONTACT SPRINGS IN THE TORQUE-SENSOR HARNESS CONNECTOR, WHICH AFFECTED THE ELECTRICAL CONNECTION IN THE STEERING GEAR CONNECTOR."

- TRUCK HAS SHUT OFF TWICE WHILE DRIVING ONCE WHILE SLOWING TO MAKE A TURN AND ONCE WHILE SLOWING TO GO OVER A SPEED BUMP I GET A DASH NOTICE THAT THE POWER STEERING IS OFF

PUT TRUCK IN NEUTRAL AND RESTART . ALSO ONCE WHILE RUNNING IN MY DRIVEWAY FOR ABOUT 3 MINUTES POWER STEERING SHUT OFF AND STABILITY SYSTEM WARNING CAME ON TRUCK WAS STILL RUNNING HAD TO SHUT TRUCK OFF AND RESTART. THIS LOSS OF STEERING AND VEHICLE SHUTTING OFF WHILE DRIVING IS DANGEROUS

- LOSS OF POWER STEERING INTERMITTENTLY AND HARD TO STEER WHILE DRIVING DOWN HIGHWAY. MUST PULL OVER AND TURN OFF ENGINE. START AGAIN TO RESET. CAN HAPPEN ONCE OR THREE TIMES BEFORE GOES AWAY.

* * *

- LOSS OF ELECTRIC POWER STEERING WHILE MOVING AT SPEEDS BELOW 30 MPH.
- AS I WAS DRIVING MY TRUCK, I HAD A LOSS OF POWER STEERING ASSIST AND MY DASHBOARD DISPLAYED WARNINGS. I WAS ON ABLE TO STEER THE TRUCK AND ALMOST VEERED OFF THE ROAD. I HAD TO STOP ABRUPTLY. I TURNED OFF THE ENGINE AND RESTARTED THE TRUCK. THE POWER STEERING AGAIN WORKED. I TOOK IT TO THE DEALER AND THEY SAID THAT I NEEDED TO REPLACE THE ELECTRIC BELT DRIVE RACK AND PINION STEERING GEAR. THEY SAID THERE WAS A PROBLEM WITH THE ELECTRICAL CONNECTION IN THE ELECTRONIC STEERING GEAR. THIS IS THE EXACT SAME ISSUE IN RECALL NUMBER 15595B. THEY SAID MY VEHICLE WAS NOT LISTED ON THE RECALL AND THAT IT WAS MANUFACTURED A COUPLE MONTHS BEFORE THE RECALL DATES. IT IS OBVIOUSLY THE SAME ISSUE SO I CALLED GM AND THEY JUST WERE TALKING IN CIRCLES. I CANNOT AFFORD A \$2000 REPAIR. IT IS SO OBVIOUS IT IS THE SAME ISSUE AND NOT TO RECOGNIZE IT IS CRIMINAL IN MY OPINION. THIS IS A VERY DANGEROUS PROBLEM. THEY NEED TO FIX THIS BEFORE PEOPLE GET KILLED ON THE ROAD.
- ON TWO OCCASIONS RECENTLY, MY POWER STEERING STOPPED WORKING, ONCE ON START UP AND ONCE WHILE DRIVING. WHEN THIS HAPPENS, I GET WARNINGS THAT OTHER SYSTEMS AREN'T WORKING, SUCH AS STABILITRAK AND BACKUP ASSIST. PROBLEM SEEMS TO CORRECT ITSELF, AFTER TURNING THE TRUCK OFF. THIS HAPPENED SUNDAY, JUNE 16TH WHILE DRIVING AND BACK IN MARCH WHEN I FIRST STARTED THE TRUCK.
- POWER STEERING GOES OUT AT RANDOM TIMES. RECEIVED RECALL FROM GMC ABOUT ISSUE AND TOOK TO SHOP. DID NOT FIX! IN FACT, THE POWER STEERING WENT OUT ON THE WAY HOME FROM THE RECALL VISIT. IT IS IMPOSSIBLE FOR MY TEENAGED CHILDREN AND WIFE TO DRIVE WHILE POWER STEERING IS OUT

- POWER STEERING WOULD GO OUT GOING DOWN THE ROAD WOULD HAVE TO PULL OVER AND RESTART VEHICLE. TOOK IT TO DEALER THEY SAID STEERING RACK WENT BAD AND HAD TO PAY \$2000 FOR NEW STEERING RACK.
- RANDOM POWER STEERING LOSS
- THE TRUCK WILL LOSE POWER STEERING AT ANY TIME OR SPEED WHILE THE TRUCK IS MOVING. THE MESSAGE ON THE DASH READS SERVICE STEERING ASSIST. WHEN I AM DRIVING IT CAN PULL THE STEERING WHEEL OUT OF YOUR HANDS IT'S VERY DANGEROUS. I REPORTED THIS TO MY DEALER AND GMC LAST YEAR THEY FOUND NOTHING WRONG BUT IT IS STILL DOING IT. WHEN YOU CAN GET THE TRUCK TO THE SIDE OF THE ROAD AND TURN IT OFF AND BACK ON IT IS FINE FOR A WHILE AND IT WILL DO IT AGAIN THE SAME WAY. NOW DEALER IS SAYING THE STEERING GEAR ASSEMBLY NEEDS REPLACING AT A VERY HIGH PRICE. I THINK ITS ELECTRICAL. THERE IS A RECALL FOR A PLUG BUT FOR SOME REASON MY TRUCK DOES NOT FALL UNDER THAT RECALL BUT IS STILL HAVING THE SAME PROBLEM. I THINK SOMEONE IS GOING TO BE SEVERELY HURT OR KILLED BY THIS PROBLEM. THEY NEED TO FIX THIS AT THEIR COST NOT MINE. WORRIED.
- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING VARIOUS SPEEDS, THE STEERING WHEEL SEIZED AND ALL THE WARNING INDICATORS ILLUMINATED ON THE INSTRUMENT PANEL. THE CONTACT HAD TO TURN OFF AND RESTART THE VEHICLE FOR THE STEERING TO RETURN TO NORMAL. THE DEALER (LAVERY AUTOMOTIVE SALES AND SERVICE, 1096 W STATE ST, ALLIANCE, OH 44601, (330) 238-4178) WAS CONTACTED AND STATED THAT THE VIN WAS NOT INCLUDED IN A RECALL. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE FAILURE REURRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND CONFIRMED THAT THE VIN WAS NOT INCLUDED IN A RECALL. THE FAILURE MILEAGE

WAS 70,000.

- I WAS DRIVING ON THE DOWNWARD SLOPE OF THE STEEP MISSISSIPPI BRIDGE IN BATON ROUGE, LA AND LOSS MY POWER STEERING CONTROL. LUCKILY, I WAS ABLE TO PULL TO THE SIDE OF THE INTERSTATE. I COMPLAINED ABOUT THIS A MONTH AGO WHEN I TOOK THE TRUCK TO GERRY LANE GMC. I WAS TOLD IT WAS A BAD BATTERY. SO I PURCHASED A BATTERY FROM THE DEALERSHIP. NOT EVEN A WEEK LATER THE SAME PROBLEM OCCURRED. HOWEVER, WHEN I CUT THE IGNITION OFF AND CRANK BACK UP IT RESETS. THE SERVICE ADVISOR STATED TO BRING IT BACK IN IF IT HAPPENS AGAIN. THIS TIME (ABOUT TWO WEEKS LATER) WHILE I LOST POWER I WAS ABLE TO VIDEO SO I CAN SHOW THIS ADVISOR WHAT KEEPS HAPPENING. THIS TIME IT TOOK ME AT LEAST 4 TIMES CRANKING UP AND THEN SHUTTING OFF THE ENGINE TO GET IT TO RESET SO I COULD GET BACK HOME AND SWITCH CARS. I WAS TOO AFRAID TO CONTINUE DRIVING GOING OVER THE NEXT BRIDGE THAT'S 20 PLUS MILES WITHOUT AN EXIT AND LOSE POWER STEERING AGAIN. I?VE HAD TO RENT CARS FOR THIS REPETITIVE OCCURRENCE WITH THIS TRUCK THAT SEEMS TO NOT BE ABLE TO BE REPAIRED. OR EITHER THEY KNOW WHAT?S WRONG BUT WAITING FOR IT TO BE OUT OF WARRANTY FOR ME TO TAKE ON THE COST OF REPAIRING IT. BUT THIS IS NOT SAFE TO KEEP LOSING POWER STEERING AND I?M DRIVING ANYWHERE BETWEEN 50 TO 70 MPH. I ALSO EXPLAINED THAT WHEN I PARK I CAN?T TURN THE KEY TO TAKE OUT OF THE IGNITION. SO AGAIN I HAVE TO CRANK UP AND PULL FORWARD TO TRY AND RESET SO I CAN BE ABLE TO REMOVE THE KEY FROM THE IGNITION. I TOOK A VIDEO OF THAT AS WELL THAT I CAN?T POST.
- TL* THE CONTACT OWNS A 2015 GMC CANYON. THE CONTACT STATED THAT THE ELECTRIC POWER STEERING WARNING INDICATOR FLASHED AND THE POWER STEERING FAILED WHILE DRIVING APPROXIMATELY 70 MPH. THE CONTACT HAD TO MANEUVER THE STEERING WHEEL AT A HIGH RATE OF SPEED WITH EXTREME

DIFFICULTY. THE VEHICLE WAS NOT INCLUDED IN NHTSA CAMPAIGN NUMBER: 16V054000 (STEERING) ACCORDING TO THE MANUFACTURER AND MCCONNELL AUTOMOTIVE (3150 DAUPHIN ST, MOBILE, AL 36606, (251) 476-4141); ALTHOUGH, THE VEHICLE EXHIBITED THE SAME FAILURE AS LISTED IN THE RECALL. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS NOT AVAILABLE.

- TL* THE CONTACT OWNS A 2015 GMC CANYON. THE CONTACT STATED THAT WHILE DRIVING, THE CHECK ENGINE WARNING LIGHT ILLUMINATED AND THE POWER STEERING WOULD MALFUNCTION. THE CONTACT WOULD PULL OVER AND RESTART THE VEHICLE BUT THE ISSUE WOULD RECUR. THE DEALER (NYLE MAXWELL GMC 3000 I-35, ROUND ROCK, TX 78681 (512) 244-8000) DIAGNOSED THE FAILURE AND REPLACED THE STEERING GEAR. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND STATED THAT THE RECALL REMEDY FOR NHTSA CAMPAIGN NUMBER: 16V054000 (STEERING) ENDED OCTOBER OF 2018. THE FAILURE MILEAGE WAS 67,528.
- POWER STEERING FAILS. ALARMS STEERING FAILURE, STABILITY ERRORS AND THAT STEERING MAY BE DIFFICULT. THIS IS THE EXACT SAME ERROR AND THE RECALL 16V054000. GMC CLAIMS THAT MY VEHICLE IS NOT ONE OF THE EFFECTED VEHICLE. WELL II OBVIOUSLY IS AND GMC IS TRYING TO MINIMIZE THE TOTAL NUMBER OF RECALLS. THE DEALER WANTS A HUGE AMOUNT OF MONEY TO TROUBLESHOOT AND POSSIBLY REPAIR ISSUE, BUT THEY ALSO CLAIM NO RECALL SO NO HELP FROM GMC. THE HAPPENS AT BOTH FREEWAY SPEED AND CRAWLING IN TRAFFIC. STEERING WHEELS JERKS THEN ALARMS GO OFF. MY WIFE WILL NO LONGER DRIVE THIS VEHICLE AS SHE CANNOT TURN THE WHEEL WHEN THIS HAPPENS AND SHE ALMOST CRASHED. I HAVE ALSO ALMOST CRASH WHEN THIS HAPPENED AND I WAS CAUGHT BY SURPRISE AND ALMOST DID NOT MAKE A TURN AND HIT THE CURB. ALARMS WILL RESET IF I STOP

AND TURN OFF THE VEHICLE THEN RESTART. BUT THAT'S NOT REALLY POSSIBLE AT FREEWAY SPEEDS OR IN LOCAL TRAFFIC. GMC IS HIDING THE FACT THAT THE RECALL 16V054000 IS LARGER THAN THEY CLAIMED. THIS SAFETY ISSUE NEEDS TO BE ADDRESSED ASAP BEFORE SOMEONE IS INJURED OR KILLED BECAUSE OF A KNOWN ISSUE THE GMC WILL NOT OWN. THIS HAS HAPPENED AT LEAST 5 TIMES NOW AND AFTER CONTACTING GMC THEY CLAIMED ITS NOT THERE PROBLEM AND I NEED TO PAY TO HAVE THE TRUCK REPAIRED. FIRST HAPPENED DECEMBER 2018 WHEN GMC WAS CONTACTED AND HAS NOT HAPPENED 5 MORE TIMES. THE LAST TIME ON MARCH 31, 2019 IT HAPPENED TWICE IN LESS THAN 1/2 HOUR. SO THE ISSUE IS GETTING WORSE. PLEASE LET GMC KNOW THEY MISSED A FEW TRUCKS WITH THEIR RECALL DATES.

- MY CANYON TRUCK STEERING STOP WORKING WHILE DRIVING AND IT IS VERY HARD TO TURN IF IT WOULD OF BEEN ANY FASTER I WOULD OF CRASHED AND IT DOES NOT RETURN . I WAS READING THE RECALL ON THAT YEAR GMC SAY IT COMES BACK ,THAT IS FALSE ONCE THE ISSUE A RAISES YOU DO HAVE CONTROL OF VEHICLE
- STEERING ASSISTANCE STOP WORKING WHILE DRIVING COULDNT TURN ALMOST CRASHED LIGHT CAME ON AND POWER STEERING WENT OUT ON IT
- I WAS TAKING A CORNER TO GO UP TO MY ROAD AND THEN MY POWER STEERING CHIME WENT OFF POSTING POWER STEERING HAS FAILED, THEN A MESSAGE SAYING THE STABILITY CONTROL ISN'T FUNCTIONAL. I DROVE INTO A SMALL DITCH BECAUSE I COULDNT TURN MY WHEEL. I WAS AT A SLOW SPEED. I TURNED OFF THE TRUCK, AND THE WARNING WENT AWAY. THIS HAS HAPPENED AT LEAST 8 TIMES AND HAVE TAKEN IT TO TWO DEALERS AND THE FINAL DEALER SAID I COULDNT DRIVE THE TRUCK UNTIL I REPLACE THE RACK & PINION ASSY. HE HAS SAID THIS SHOULD BE PART OF THE RECALL. MY TRUCK WAS BUILT DEC 05, 2014 AND INSPECTED ON JAN 01, 2015. THIS JUST COSTED ME

\$1700.00.

SPRINGFIELD OR

RECALL NUMBER

16V054000

RECALL DATE

02/01/2016

GM RECALL: 15595 AND NOW AN OPEN INVESTIGATION.

COMPONENT:

STEERING: ELECTRIC POWER ASSIST SYSTEM

SUMMARY

GENERAL MOTORS LLC (GM) IS RECALLING CERTAIN MODEL YEAR 2015 CHEVROLET COLORADO VEHICLES MANUFACTURED JANUARY 6, 2015, TO MARCH 17, 2015, AND 2015 GMC CANYON VEHICLES MANUFACTURED JANUARY 6, 2015, TO MARCH 19, 2015. A POOR ELECTRICAL CONNECTION WITHIN THE STEERING GEAR CONNECTOR MAY CAUSE A LOSS OF POWER STEERING ASSIST.

CONSEQUENCE: A LOSS OR REDUCTION IN POWER STEERING ASSIST MAY INCREASE THE RISK OF A CRASH.

WHAT OWNERS SHOULD DO: GM WILL NOTIFY OWNERS, AND DEALERS WILL REPLACE THE STEERING GEAR TORQUE SENSOR COVER ASSEMBLY, FREE OF CHARGE. THE RECALL BEGAN MARCH 1, 2016. OWNERS MAY CONTACT CHEVROLET CUSTOMER SERVICE AT 1-800-222-1020 OR GMC CUSTOMER SERVICE AT 1-800-462-8782. GM'S NUMBER FOR THIS RECALL IS 15595.

- 2015 GMC CANYON. CONSUMER WRITES IN REGARDS TO

POWER STEERING FAILURE. *LD *TR

- THE POWER STEERING ASSISTANT ON THIS CAR IS TURNING OFF WHILE DRIVING. I ALREADY TOOK THE CAR TO A DEALER THEY CHARGED ME \$1000 FOR A CABLE AND THE CAR STILL DOING THE SAME THING AND YOU HAVE A RECALL ON THIS CAR BUT THIS ONE IS NOT IN THE MONTHS THAT THE RECALL WAS MADE
- I HAD BROUGHT MY CANYON IN TO GET THE STEERING RACK REPLACED BECAUSE OF THE POWER STEERING ISSUE AND THE RECALL. I ENDED UP HAVING TO DRIVE MY TRUCK TO THE DEALER WITHOUT POWER STEERING WHEN I GOT IT FIXED. NOW THAT THE STEERING RACK HAS BEEN REPLACED THERE'S SLACK IN MY STEERING WHEEL WHILE I'M DRIVING. THE DEALER NOW SAYS THAT I NEED TO CHANGE MY STEERING COLUMN BECAUSE THERE'S SLACK IN THE JOINTS IN THE STEERING COLUMN THAT IS CAUSING THE PLAY IN THE STEERING WHEEL. THERE WAS NO PLAY IN THE STEERING PRIOR TO THIS NO POWER STEERING EVENT AND IT CERTAINLY SEEMS THAT DRIVING THE TRUCK WITHOUT POWER STEERING CAUSED THIS ISSUE WITH THE JOINTS IN THE STEERING COLUMN THAT NOW THEY WANT TO CHARGE ME \$800 TO FIX. THIS REPAIR SHOULD BE COVERED SINCE IT'S PRETTY APPARENT THAT THE RECALL ISSUE, DRIVING WITHOUT POWER STEERING, CAUSED THIS ISSUE AS WELL.
- WHILE DRIVING THE POWER STEERING FAILS. THE ELECTION CONTROL CHECK LIGHT COMES ON DURING THIS TIME. THIS STARTS WHEN DRIVING AND ONLY RESETS ITSELF ONCE THE VEHICLE IS TURNED OFF AND BACK ON SEVERAL TIMES.
- ON SEPARATE OCCASIONS WHILE VEHICLE WAS IN ON POSITION (IN DRIVE, IN MOTION, AND/OR IN PARK), ALERTS CAME ON DASHBOARD ALERTING TO 2 SERVICE ISSUES. 1. SERVICE STABILITRAK AND 2. SERVICE POWER STEERING. AT THAT TIME POWER STEERING IN THE VEHICLE WAS LOST. VEHICLE WAS DRIVEN INTO SAFE

AREA, TURNED OFF, AND THEN TURNED BACK ON. UPON RESTART, VEHICLE DASH ALERTS AND POWER STEERING ISSUE WERE NO LONGER APPARENT.

- I DROVE THE PICKUP TO WORK. AFTER BEING PARKED A COUPLE OF HOURS I STARTED IT TO RETURN HOME. UPON STARTING, A WARNING ABOUT THE NEED TO SERVICE THE POWER STEERING ILLUMINATED ON THE DASH DISPLAY. STEERING WAS EXTREMELY HEAVY AND DIFFICULT. I IMMEDIATELY TOOK THE VEHICLE TO A DEALERSHIP. AT THE DEALERSHIP, THE MECHANIC FOUND THAT THE STEERING BOX WOULD NEED REPLACEMENT. THE TRUCK HAS 8100 TOTAL MILES. THAT FIGURE IS NOT A MISPRINT, IT HAS LESS THAN 10,000 MILES. HAD THIS OCCURRED WHILE DRIVING, THE RESULT COULD HAVE BEEN DEADLY. APPARENTLY, THIS IS A KNOWN PROBLEM WITH THE 2015 CANYON AND HAS HAD CERTAIN VEHICLES RECALLED, DEPENDENT ON BUILD DATE. A BRIEF INTERNET SEARCH PRODUCED APPROXIMATELY 30 OTHER CANYONS WITH THIS SAME ISSUE. THE DEALERSHIP IS ATTEMPTING TO CONVINCE THE REGIONAL REPRESENTATIVE FROM GMC TO COVER THE REPAIR. THE TRUCK WAS ONE MONTH OUT OF WARRANTY.
- TRUCK BEGAN LOSING STEERING CONTROL A MONTH AGO, THEN BECAME MORE FREQUENT THE LAST 2 WEEKS. DEALER REPLACE ENTIRE RACK AND PINION ASSEMBLY BECAUSE ELECTRIC STEERING HARNESS AND MODULES WERE FRIED. THIS WAS DUE TO LITTLE OR NO DI-ELECTRIC GREASE IN THE CONNECTOR PLUGS, WHICH ALSO, ARE NOT WEATHERPROOFED FROM THE ELEMENTS. \$2000 OUT OF MY POCKET TO FIX BECAUSE RECALL ONLY COVERS EARLIER MODELS. THIS IS A VERY SERIOUS SAFETY ISSUE. 3 TIMES THE STEERING GAVE OUT WHILE DRIVING AND IS VERY DIFFICULT TO CONTROL EVEN IF YOU CATCH IT IN TIME. THESE VEHICLES ARE DANGEROUS TO EVERYONE. I WANTED TO FIX IT BEFORE I GET RID OF IT SO SOMEONE ELSE WOULD NOT BE STUCK WITH THIS PROBLEM. TRUCK HAS 50,000 MILES ON IT. BAD DESIGN ON THE ELECTRIC POWER STEERING, CONNECTORS ARE IN THE ELEMENTS

AND UNPROTECTED.

- LESS THAN 48 HOURS AFTER A DEALER OIL CHANGE, MY 2015 GMC CANYON EXPERIENCED A POWER STEERING FAILURE WHILE MAKING A RIGHT TURN AT A LIGHT. STABILITRAC/TRACTION CONTROL FAILURE ALSO OCCURRED WITH SERVICE NOTICES AND FAULT LIGHTS APPEARING ON THE DASH. VEHICLE HAD TO BE TOWED VIA FLATBED TO THE DEALERSHIP.
- STEERING WHEEL LOCKS UP WHILE DRIVING AND TURNING TO THE LEFT. THIS HAS HAPPENED TWICE SO FAR, LUCKILY IT HAD RETURNED TO NORMAL QUICKLY. GM HAS A RECALL FOR THIS BUT ONLY VEHICLES MADE JAN.2015 THRU MARCH 19, 2015. MY TRUCK WAS MADE ON MARCH 27, 2015. THIS PROBLEM JUST SHOWED UP NATURALLY AFTER WARRANTY. VEHICLE HAS 50,501 MILES. I HAVE ALSO HEARD OF 2017 MODELS HAVING THE SAME ISSUE. THIS IS A HUGE SAFETY ISSUE THAT SHOULD NOT BE IGNORED!
- VEHICLE WAS STOPPED AT A STOPLIGHT WHEN THE INSTRUMENT CLUSTER STARTED ALERTING THAT STABILITRACK STABILITY CONTROL NEEDED TO BE SERVICED AND POWER STEERING WAS DISABLED, AS WELL AS THE TRACTION CONTROL OFF LIGHT WAS ILLUMINATED IN THE INSTRUMENT CLUSTER. TURNED VEHICLE OFF AND RESTARTED - POWER STEERING MESSAGE REAPPEARED BUT QUICKLY WENT AWAY AND POWER STEERING FUNCTION RETURNED. THE NEXT DAY WHILE DRIVING < 30 MPH ON CITY STREETS THE ERROR MESSAGES AND PROBLEMS REAPPEARED 4 OR 5 TIMES.
- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING APPROXIMATELY 5 MPH, THE POWER STEERING AND STABILITRACK WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO SUTLIFF BUICK GMC (169 W AARON DR, STATE COLLEGE, PA 16803), BUT THE CAUSE OF THE FAILURE COULD NOT BE DIAGNOSED. THE VEHICLE WAS NOT REPAIRED AND THE FAILURE PERSISTED. THE

CONTACT STATED THAT THE VEHICLE WAS RESTARTED AND THE WARNING INDICATORS DIMMED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE VIN WAS NOT INCLUDED IN NHTSA CAMPAIGN NUMBER: 16V054000 (STEERING). THE APPROXIMATE FAILURE MILEAGE WAS 44,680. *TT

- HAVING MULTIPLE PROBLEMS WITH POWER STEERING FAILURE. THIS HAS HAPPENED ON MULTIPLE OCCASIONS. I HAVE TO STOP THE TRUCK TURN IT OFF TO GET IT TO RESET. SOME DAYS IT MAY TAKE TURNING OFF THE VEHICLE 15 TO 20 TIMES BEFORE IT WILL RESET
- WOULD RANDOMLY EXPERIENCE LOSS OF ELECTRICAL POWER STEERING ASSIST. LOSS OF ASSIST WOULD HAPPEN AT ALL TIMES, WHILE STATIONARY, WHILE DRIVING STRAIGHT, WHILE TURNING, AT HI LOW OR NO SPEEDS. NEEDED TO PARK VEHICLE AND TURN OFF AND RESTART VEHICLE TO RESTORE POWER STEERING ASSIST. OPERATOR WOULD BE PROMPTED WITH A "LOSS OF POWER STEERING, DRIVE WITH CARE" WARNING. SCANNING WITH OBDII TOOL SHOWED THE LOSS OF STEERING ASSIST WAS ALWAYS TIED TO U0420 DTC. ERRORS WERE OCCURRING IN AUGUST SO TEMPS WERE BETWEEN 70 AND 100 DEGREES F. ERROR IS BEHAVING EXACTLY LIKE A LOOSE ELECTRICAL CONNECTION, PROBABLY TO THE POWER STEERING TORQUE SENSOR.

VEHICLE WAS TAKEN TO DEALERSHIP AND APPEARED TO BE EXHIBITING THE EXACT SAME SYMPTOMS AS NHTSA RECALL 16V054000. TRIED TO GET GM TO HONOR THIS REPAIR HOWEVER THEY CLAIMED MY VEHICLE IS NOT IN THE AFFECTED 2015 MODEL YEAR DATE RANGE. DEALER PERFORMED THE SAME REPAIR DEFINED BY THE RECALL AND HAVE NOT HAD ANY POWER STEERING LOSS FOR LAST 3 WEEKS SINCE RECEIVING VEHICLE BACK FROM DEALER. IF THE ERROR WAS NOT FIXED I WOULD HAVE EXPECTED IT TO CONTINUE HAPPENING AT THE SAME FREQUENCY AS BEFORE (2-5 TIMES PER DAY)

- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING VARIOUS SPEEDS, THE STEERING SEIZED. THE VEHICLE WAS ABLE TO BE OPERATED, BUT EXCESSIVE EFFORT WAS NEEDED TO TURN THE VEHICLE. IN ADDITION, THE POWER STEERING AND STABILITRAK WARNING INDICATORS ILLUMINATED. THE DEALER AND MANUFACTURER WERE NOT CONTACTED. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE FAILURE MILEAGE WAS APPROXIMATELY 38,295.
- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING APPROXIMATELY 35 MPH, THE VEHICLE LOST POWER AND THE POWER STEERING ASSIST AND TRACTION CONTROL WARNING INDICATORS ILLUMINATED. IN ADDITION, THE "SERVICE SELECT A TRACK" MESSAGE APPEARED AND THE STEERING ABILITY BECAME VERY DIFFICULT. THE CONTACT PULLED THE VEHICLE OVER TO THE SIDE OF THE ROAD AND SHUT OFF THE VEHICLE. AFTER APPROXIMATELY THREE MINUTES, THE VEHICLE WAS RESTARTED AND OPERATED NORMALLY. THE CONTACT STATED THAT THE FAILURE OCCURRED TWICE IN A WEEK. THE VEHICLE WAS NOT TAKEN TO THE DEALER OR AN INDEPENDENT MECHANIC FOR DIAGNOSTIC TESTING. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND STATED THAT THE VIN WAS NOT INCLUDED IN NHTSA CAMPAIGN NUMBER: 16V054000 (STEERING). THE VEHICLE WAS NOT REPAIRED. THE APPROXIMATE FAILURE MILEAGE WAS 56,000.
- TWICE WHILE DRIVING THE POWER STEERING HAS GONE OUT AND THE STABILITY CONTROL LIGHT HAS COME ON. THE FIRST TIME I CUT THE TRUCK OFF AND RESTARTED IT. AT THAT POINT IT APPEARED TO BE FINE. NOW IT BEEN ABOUT 2 WEEKS SINCE THE FIRST OCCURRENCE AND THIS MORNING IT HAPPENED AGAIN. I RESEARCHED TO SEE IF THERE WERE ANY RECALLS. THERE IS A RECALL ON THE POWER STEERING FOR THE 2015 CANYON BUT I'M BEING TOLD THAT MY TRUCK IS NOT ON THE LIST. I THINK THEY NEED TO LOOK DEEPER INTO THIS PROBLEM.

- POWER STEERING AND STABILITY CONTROL DROP OUT WHILE DRIVING AT ANY SPEED. TURNING THE VEHICLE OFF AND CRANKING AGAIN WILL RESTORE POWER STEERING. SOMETIMES THIS MUST BE DONE 2 OR 3 TIMES TO GET POWER STEERING BACK. THIS IS HAPPENING DAILY.
- I WAS DRIVING ABOUT 35 MILES AN HOUR WHEN STABILITRAC AND LOSS OF STEERING ASSIST WARNING LIGHTS CAME ON. STEERING BECAME EXTREMELY DIFFICULT AND I VEERED INTO THE ONCOMING LANE WHILE MAKING A RIGHT HAND TURN TO EXIT THE MAIN ROAD. I WAS GOING TO HAVE THE VEHICLE TOWED TO THE DEALERSHIP, BUT THE DEALERSHIP SERVICE AGENT RECOMMENDED TURNING THE VEHICLE OFF AND RESTART AFTER 30 SECONDS. THIS WORKED, BUT I TOOK IT IN TO THE DEALER TO HAVE IT CHECKED. THEY FOUND NO FAULT CODES. FIVE DAYS LATER IT HAPPENED AGAIN WHILE ON THE INTERSTATE DOING 70 MPH. FORTUNATELY, I ONLY NEEDED TO MAKE THREE TURNS TO GET TO THE DEALERSHIP. THE DEALERSHIP REPLACED THE POWER STEERING RACK ASSEMBLY AT A COST OF \$1662.01. I CONTACTED GM TO ASK IF THE EXPENSE WOULD BE COVERED BY RECALL 16V054000. I WAS ASSIGNED A CASE SERIAL AND AFTER SEVERAL INQUIRIES, A SENIOR GM REPRESENTATIVE STATED IT WAS NOT COVERED BY THE RECALL AND IT WAS A DIFFERENT MODULE CAUSING THE RECALL. SHE OFFERED A \$100 VOUCHER FOR FUTURE VEHICLE SERVICE AND CLOSED MY CASE AS DISSATISFIED. REGARDLESS OF THE MODULE, LOSS OF STEERING IS A LIFE THREATENING HAZARD AND THE RECALL SHOULD BE EXPANDED. THE VEHICLE HAD APPROXIMATELY 81,900 AND 82,100 MILES WHEN THIS OCCURRED.
- WHILE DRIVING , LOST POWER STEERING ASSIST, VERY HARD TO STEER. TOOK TO DEALER AND GOT THE FOLLOWING ERROR CODE - C0545 - STEERING WHEEL TORQUE SENSOR.

THIS HAS HAPPENED TWICE AND IN BOTH OCCASIONS, IT IS VERY HARD TO STEER . IN BOTH INSTANCES, DRIVING ON THE HIGHWAY AND VERY HARD TO PULL OVER. ONCE YOU E ERROR DISSAPEARS

- OCCASIONALLY, WHILE DRIVING A WARNING CHIME SOUNDS AND POWER STEERING FAILS. IT BECOMES VERY DIFFICULT TO STEER THE TRUCK AND TWO WARNINGS ARE DISPLAYED, "POWER STEERING DISABLED" AND "STABILITRAK OFF". IF I PULL OVER, STOP, AND TURN OFF THE ENGINETHE PROBLEM CLEARS UPON RESTART. THIS IS INCREDIBLY DANGEROUS. THE PROBLEM HAS OCCURRED WHILE DRIVING SLOWLY AND AT HIGHWAY SPEEDS. IT IS HAPPENING MORE FREQUENTLY WITH INCREASING MILEAGE. CURRENT MILEAGE IS 70K BUT HAS BEEN HAPPENING SINCE ABOUT 40K.
- ON SEVERAL OCCASIONS I HAVE LOST ALL POWER STEERING AFTER GETTING 2 SERVICE WARNINGS.

IN THIS TYPE OF VEHICLE WITH ELECTRIC POWER ASSIST STEERING, IT IS INCREASING DIFFICULT TO STEER. (WORSE THAN AN OLD TRUCK WITHOUT POWER STEERING) IN THE EVENT OF AN EMERGENCY, IF THIS WERE TO HAPPEN SUDDENLY, I CAN NOT SEE HOW IT WOULD BE POSSIBLE TO MAINTAIN CONTROL OF THE VEHICLE.

I AM GETTING 2 WARNINGS. THE FIRST IS TO "SERVICE STABILITRACK" AT THE SAME TIME, "SERVICE POWER STEERING DRIVE WITH CARE". AT THIS POINT I LOSE ALL POWER STEERING. THE ERRORS OCCUR WHEN DRIVING, AND HAVE ALWAYS HAPPENED AT HIGHWAY AND INTERSTATE SPEEDS (40+ MPH?). IN ALL INITIAL INSTANCES, THE TRUCK WAS TRAVELING ON WELL MAINTAINED ROADS, WHICH WERE STRAIGHT. I WAS NOT MAKING ANY TURNS SUCH AS A TRAFFIC SIGNAL OR INTERSECTION. ON OCCASIONS I HAVE BEEN ABLE TO PULL OVER, STOP, TURN THE TRUCK OFF, RESTART AND THE ERROR CLEARS. IN THE LAST 2 DAYS I HAVE

CLEARED THE ERROR, BUT IT RETURNS WITH THE SAME RESULT, NO POWER STEERING.

AFTER READING SOME REVIEWS ONLINE, IT SEEMS TO BE A SOMEWHAT COMMON ISSUE, AND MOST RESULT IN A LOSS OF POWER STEERING. MY TRUCK IS CURRENTLY AT THE DEALER AND THE PART WAS NOT IMMEDIATELY AVAILABLE (POSSIBLY SHOWING THE NUMBER OF ISSUES??)

THE DEALERSHIP HAS STATED THAT IT IS THE 'STEERING GEAR', OR RACK & PINION WHICH HAS FAILED. THE VEHICLE HAS ADDITIONALLY HAD A RECALL FOR SIMILAR ISSUES, BUT THE DEALERSHIP STATED THAT IT WAS FOR A 'SOFTWARE UPDATE'. THIS IS SAID TO HAVE BEEN THE FIX IN OTHER SIMILAR SITUATIONS.

I SEE THIS AS A SERIOUS SAFETY ISSUE, THE MOST SERIOUS I HAVE HAD IN ANY TRUCK I HAVE OWNED. THIS IS THE REASON FOR FILING THIS REPORT.

- POWER STEERING FAILED ON HIGHWAY AND VEHICLE WAS VERY HARD TO STEER AND CONTROL. WAS VERY DIFFICULT TO STEER OFF THE HIGHWAY. DANGEROUS.
- SUDDEN TOTAL LOSS LOSS OF ELECTRIC POWER STEERING ASSIST WHILE DRIVING ON THE INTERSTATE.

SUDDEN TOTAL LOSS LOSS OF STABILITY CONTROL SYSTEM WHILE DRIVING ON THE INTERSTATE.

- POWER STEERING WILL GO OUT WITHOUT WARNING. THERE IS A RECALL ON 2015 GMC CANYON BUILT BETWEEN JANUARY 6 AND MARCH 15, 2015. I PURCHASED MY GMC ON DECEMBER 23, 2014. I RECEIVED MY VEHICLE ON MARCH 4, 2015. IT IS VERY CONCERNING WITH THE STEERING GOES OUT AS IT IS EXTREMELY DIFFICULT TO STEER. I AM TOLD BY THE DEALER THAT MY VIN NUMBER DOES NOT APPLY TO THE RECALL EVEN THOUGH MY PRODUCTION DATE FALLS WITHIN THE CRITERIA. MY

VEHICLE IS EXPERIENCING THE EXACT CHARACTERISTICS OF THE RECALL. THE DEALER DID INFORM ME THAT THERE WAS A RESET FOR MY POWER STEERING, WHICH I PAID THEM \$50 TO DO AND THE PROBLEM PERSISTS.

YOUR ASSISTANCE WITH THIS DANGEROUS PROBLEM WOULD BE APPRECIATED.

- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING BETWEEN 20-60 MPH, THE POWER STEERING MALFUNCTIONED AND THE STEERING WHEEL BECAME VERY DIFFICULT TO TURN IN EITHER DIRECTION. THE FAILURE OCCURRED ON FOUR SEPARATE OCCASIONS. AFTER TURNING THE ENGINE OFF AND RESTARTING THE VEHICLE, THE POWER STEERING OPERATED AS NORMAL. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO FOUNTAIN AUTO MALL (8701 S ORANGE BLOSSOM TRAIL, ORLANDO, FL 32809, (407) 240-3800). THE MANUFACTURER WAS NOT CONTACTED. THE FAILURE MILEAGE WAS UNKNOWN.
- TODAY, I STARTED THE TRUCK, A WARNING SAID POWER STEERING WAS OUT, HAVE IT SERVICED. COULD HARDLY MOVE THE STEERING WHEEL. TOOK IT RIGHT TO THE DEALER. SHUT THE ENGINE OFF. SERVICE GUY CAME OUT TURNED IT ON, STEERING WAS O.K. HE TOLD ME TO DRIVE IT AROUND AND IF THE PROBLEM OCCURS AGAIN BRING IT BACK.
- ON THREE SEPARATE OCCASIONS WHILE DRIVING APPROXIMATELY 45 MPH A MESSAGE TO SERVICE THE STABILTRAK COMES UP AND THE VEHICLE LOSES POWER STEERING ASSIST. THE VEHICLE IS ALMOST IMPOSSIBLE TO TURN AT THAT POINT. AFTER TURNING THE VEHICLE OFF AND BACK ON THE ERROR CLEARS AND THE VEHICLE DRIVES LIKE NORMAL.
- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING 60 MPH, THE STEERING WHEEL SEIZED AND THE POWER STEERING ASSIST INDICATOR ILLUMINATED. THE

FAILURE OCCURRED TWICE. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE STEERING ASSIST FAILED NEEDED TO BE RECALIBRATED AND/OR REPLACED. A DEALER WAS NOT CONTACTED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND DECLINED TO ASSIST SINCE THE VIN WAS NOT INCLUDED IN NHTSA CAMPAIGN NUMBER: 16V054000 (STEERING). THE APPROXIMATE FAILURE MILEAGE WAS 56,000.

- MY 2015 GMC CANYON LOST POWER STEERING TRAVELING APPROXIMATELY 50MPH ON A MOUNTAIN ROAD ON ONE OF THE FIRST RAINY DAYS OF THE SEASON. IT FELT LIKE LOSING MORE THAN JUST STEERING ASSISTANCE, AS EVEN AT THAT RATE OF SPEED THE WHEEL WAS NEARLY IMPOSSIBLE TO TURN. I WAS LUCKY TO BE ON ONE OF THE LIMITED SECTIONS OF STRAIGHT ROAD. REBOOTING THE VEHICLE RETURNED STEERING FUNCTIONALITY.

DEALER FOUND CODE "C0545 - STEERING TORQUE SENSOR" AND PERFORMED SAFETY RECALL #15595 WHERE THEY REPLACED THE TORQUE SENSOR COVER. I WAS CHARGED \$200 FOR THE REPAIR DESPITE THE RECALL NOTICE EXPLICITLY STATING IT SHOULD BE PERFORMED FREE OF CHARGE. I HAVE NOT EXPERIENCED LOSS OF POWER STEERING IN THE MONTH SINCE THE REPAIR.

I CONTACTED THE GM REGIONAL REP, WHO STATED THAT CARS CAN HAVE THE SAME PROBLEM AS A SAFETY RECALL, AND THE SAME SOLUTION AS A SAFETY RECALL, BUT NOT BE PART OF THE SAFETY RECALL. THAT WAS THE JUSTIFICATION FOR THE \$200 CHARGE AND THE DENIAL OF REIMBURSEMENT. GM FURTHER STATED THAT THEY DON'T DETERMINE THE CRITERIA FOR A SAFETY RECALL, IT IS ALL UP TO THE NHTSA. IN OTHER WORDS, THEY WON'T DO THE RIGHT THING UNLESS THE GOVERNMENT FORCES THEM TO.

IN MY OPINION AS AN ENGINEER, SENSOR + RAIN SOUNDS

LIKE A PLAUSIBLE MATCH FOR THE SYMPTOMS AND THE PROBLEM IDENTIFIED BY THE SAFETY RECALL THAT THE DEALER PERFORMED. I QUESTION WHETHER THE RECALL IS MISSING SOME VIN NUMBERS, OR IF A VERY SIMILAR BUT INDEPENDENT PROBLEM EXISTS ON THE SAME COMPONENTS, WARRANTING A SEPARATE RECALL.

- TL* THE CONTACT OWNS A 2015 GMC CANYON. THE CONTACT STATED THAT THE POWER STEERING FAILED AND THE POWER STEERING STABILITY WARNING INDICATOR ILLUMINATED. THE VEHICLE WAS TAKEN TO A LOCAL DEALER (MCGRATH BUICK GMC CADILLAC, 1040 N CENTER POINT RD, HIAWATHA, IA 52233) WHERE IT WAS DIAGNOSED THAT THE SYSTEM NEEDED TO BE REPROGRAMMED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE ISSUE AND DID NOT ASSIST. THE FAILURE MILEAGE WAS 92,608.
- 2015 GMC CANYON CREW CAN 4 WD HAS INTERMITTENTLY HAD POWER STEERING FAIL. MY WIFE HAS ALMOST WRECKED TWICE DUE TO NOT BEING ABLE TO STEER VEHICLE. CALLED DEALER & WAS TOLLS " IT'S NOT SAFETY ISSUE NOR IS IT COVERED UNDER WARRANTY. WIFE WAS DRIVING ON FREEWAY AT @ 65-70 MPH ON ALL 6 TIMES THIS HAS HAPPENED. WITH CRUISE CONTROL ON & SUDDENLY LIGHTS COME ON THE DASH & IT BECOMES VERY DIFFICULT TO TURN THE VEHICLE, MAKING IT VERY UNSAFE FOR ANYONE TO DRIVE ESPECIALLY IF YOU DON'T HAVE GREAT STRENGTH TO TURN WHEEL.
- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING 30 MPH, THE POWER STEERING BECAME VERY DIFFICULT TO TURN LEFT OR RIGHT. THE POWER STEERING AND STABILITRACK WARNING INDICATORS ILLUMINATED WHEN THE FAILURE OCCURRED. THE CONTACT TURNED OFF AND RESTARTED THE VEHICLE. THE CONTACT WAS ABLE TO DRIVE BACK HOME NORMALLY. THE FAILURE OCCURRED TWO OTHER TIMES. THE VEHICLE WAS TAKEN TO THE DEALER (MCELVEEN

BUICK GMC, 117 FARMINGTON RD, SUMMERTON, SC 29483) AND THE CONTACT WAS INFORMED THAT THE VIN WAS NOT INCLUDED IN THE RECALL. THE CONTACT HAD TO PAY FOR THE REPAIR. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS CONTACTED AT 866-636-2273 AND STATED THAT THEY WOULD HAVE THE SENIOR ADVISOR LOOK INTO THE CASE INFORM THE CONTACT BY 5:00 PM ON 9/28/17. THE MANUFACTURER PROVIDED CASE NUMBER: 8-3385010260 AND ASKED THE CONTACT TO CALL NHTSA. THE APPROXIMATE FAILURE MILEAGE WAS 38,817.

- I HAVE A 2015 GMC CANYON WITH 54700 MILES ON IT. ON OCCASION, WHILE DRIVING, THE VEHICLE BEEPS AND DISPLAYS A MESSAGE "STEERING MALFUNCTION ..." AT WHICH POINT THE STEERING ASSIST STOPS WORKING. THE VEHICLE CAN STILL BE STEERED BUT IT TAKES BOTH HANDS AND A LOT OF EFFORT TO TURN THE WHEELS, ESPECIALLY AT SLOW SPEEDS. PROBLEM APPEARS TO HAPPEN MOSTLY WHEN DRIVING ON STRAIGHT OR GENTLE CURVED ROADS.

SHUTTING OFF THE ENGINE AND LETTING THE SYSTEM "REST" FOR 5+ MINUTES ALLOWS THE POWER ASSIST STEER TO RESET AND START WORKING AGAIN, UNTIL THE NEXT FAILURE.

RECENTLY HAD THE DEALER REINSTALL THE STEERING SOFTWARE TO SEE IF THAT HAD ANY IMPACT. WORKED GOOD FOR A FEW DAYS BUT THE ISSUE RETURNED AFTER SEVERAL DAYS.

- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING AT AN UNKNOWN SPEED, THE STEERING FAILED AND THE POWER STEERING AND STABILITY WARNING INDICATORS ILLUMINATED. THE CONTACT CALLED A LOCAL DEALER (SHARRETT BUICK GMC, LOCATED AT 10312 AUTO PL HAGERSTOWN, MD 21740). THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND

PROVIDED CASE NUMBER: 8-3174680341. NO FURTHER ASSISTANCE WAS OFFERED. THE FAILURE MILEAGE WAS 44,000.

- THE POWER STEERING ASSIST HAS SHUT DOWN THREE TIMES MAKING IT VERY HARD TO STIR. THIS LAST TIME IT HAPPEN I WAS IN HEAVY TRAFFIC AND ALMOST WRECKED. MY WIFE IS 4'11" AND 95 POUNDS AND IS SCARED TO DRIVE THE TRUCK. I AM TOO NOW SINCE THE EVENT YESTERDAY. THE TRUCK WAS TAKEN TO THE DEALER FOR THE THIRD TIME YESTERDAY WHICH I WAS CLOSE TO WHEN IT HAPPENED YESTERDAY. I DRIVE IT WITHOUT THE POWER ASSIST TO MAKE SURE THEY UNDERSTAND HOW HARD IT IS TO DRIVE. IT WAS IN THE DEALER 3 OR 4 WEEKS AGO FOR A RECALL FOR THIS PROBLEM. AFTER 3 TIMES I NOR MY WIFE WANT TO DRIVE THE TRUCK AGAIN. IF IT KEEPS HAPPENING WE WILL EVENTUALLY WRECK. THE TRUCK HAS ONLY APPROXIMATELY 16,000 MILES ON IT.
- THE POWER STEERING ON MY 2015 GMC CANYON HAS FAILED REPEATEDLY WHILE DRIVING IN DIFFERENT ROAD CONDITIONS. IN ONE CASE, I WAS GOING STRAIGHT ON A SURFACE STREET AT LOW SPEED. HOWEVER, IN ANOTHER I WAS CORNERING THROUGH A HIGHWAY OFF-RAMP AT APPROXIMATELY 45 MPH. WHEN THE POWER STEERING FAILS, THERE IS A WARNING CHIME AND THE POWER STEERING AND STABILITY CONTROL WARNING LIGHTS ACTIVATE SIMULTANEOUSLY. IT BECOMES EXTREMELY CHALLENGING TO STEER, AND IN THE CASE OF CORNERING AT SPEED THE VEHICLE PULLS IN THE OPPOSITE DIRECTION OF THE TURN [IE, IT PULLS TOWARDS DANGER]. PULLING OVER AND RESTARTING THE VEHICLE HAS 'SOLVED' THE PROBLEM EACH TIME, ALBEIT TEMPORARILY. I TOOK THE VEHICLE TO A GM DEALER TO GET FIXED, BUT THEY COULD NOT FIND ANY RELATED MECHANICAL ISSUES OR GM PROVIDED SW PATCHES THAT WOULD FIX THE PROBLEM. SO THE GM DEALER HAD ME LEAVE WITHOUT FIXING ANY OF THE UNDERLYING CONDITIONS THAT CAUSED THE POWER

STEERING FAILURE. NEEDLESS TO SAY, THIS IS AN EXTREMELY DANGEROUS AND APPARENTLY WIDE-SPREAD ISSUE BASED ON THE NUMBER OF SIMILAR COMPLAINTS I HAVE READ.

- WHILE DRIVING 70 MPH ON THE HIGHWAY, THE POWER STEERING SEIZED, THE WARNING LIGHT ILLUMINATED, AND A "VEHICLE SERVICING AND DRIVE CAREFULLY" MESSAGE WAS DISPLAYED AND A CHIME WAS HEARD. THE VEHICLE WAS VERY DIFFICULT TO STEER AND TURN. THE VEHICLE WAS STOPPED TURNED OFF, RESTARTED AND DROVE TO DEALER WITHOUT ISSUES. I SEE THAT OTHER OWNERS HAVE EXPERIENCED THIS SAME ISSUE. IT IS ONLY A MATTER OF TIME BEFORE THIS ISSUE CAUSES AN ACCIDENT..
- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING 40 MPH, THE POWER STEERING FAILED, THE WARNING LIGHT ILLUMINATED, AND A "VEHICLE SERVICING AND DRIVE CAREFULLY" CHIME WAS HEARD. THE VEHICLE WAS VERY DIFFICULT TO STEER AND TURN. WITHOUT POWER STEERING ASSIST THE CONTACT PARKED THE VEHICLE AND, AFTER A FEW HOURS, RESTARTED AND DROVE THE VEHICLE WITHOUT ISSUES. THE VEHICLE WAS TAKEN TO THE DEALER FOR DIAGNOSTIC TESTING. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED. THE APPROXIMATE FAILURE MILEAGE WAS 5,000. ...UPDATED 02/08/16 *BF

THE CONSUMER STATED THE VEHICLE WAS REPAIRED. THE POWER STEERING ASSEMBLY WAS REPLACED AND THE POWER STEERING CONTROL MODULE WAS REPROGRAMMED.*JS

- TL* THE CONTACT OWNS A 2015 GMC CANYON. WHILE DRIVING APPROXIMATELY 60 TO 65 MPH ON A FOUR LANE DIVIDED HIGHWAY WITH THE CRUISE CONTROL ACTIVATED, THE POWER STEERING FAILED. THE VEHICLE WAS PULLED OVER TO THE SHOULDER, TURNED OFF, AND RESTARTED. THE POWER STEERING PINION, GEAR, AND

ELECTRONIC BRAKE CONTROL MODULE WERE ALL REPLACED. THE VEHICLE WAS REPAIRED. THE APPROXIMATE FAILURE MILEAGE WAS 7,458.

- ENTERING ON TO RTE 50 (MY LEFT SIDE) IN MICHIGAN, MY POWER STEERING AND STABILITY CONTROL LIGHTS ILLUMINATED AND BOTH FUNCTIONS STOPPED WORKING. I STRUGGLED TO PULL OVER TO THE SIDE OF THE ROAD AND TURNED OFF THE ENGINE. I RESTARTED IT AND BOTH SYSTEMS APPEARED TO BE WORKING AND NO LIGHTS ILLUMINED. I DROVE FOR A FEW MILES TO GET HOME AND WHEN I MADE A RIGHT TURN THE POWER STEERING FAULT LIGHT WENT ON AND I LOST MY POWER STEERING AGAIN. I WAS VERY FORTUNATE THAT TRAFFIC WAS LIGHT AND I WAS NOT INVOLVED IN A COLLISION. HAD MY WIFE BEEN DRIVING I DO NOT KNOW THAT SHE WOULD HAVE BEEN AS FORTUNATE. IT WAS EXTREMELY DIFFICULT TO MANEUVER THE TRUCK SAFELY WITHOUT POWER STEERING
- WHILE DRIVING ON A TWO LANE NARROW MOUNTAIN ROAD STAB/TRACK LIGHT ILLUMINATED AND POWER STEERING WENT OFF. PULLED OVER TO SIDE OF ROAD TO ASSESS THE SITUATION. TURNED IGNITION OFF AND WHEN I TURNED IT BACK ON PROBLEM WENT AWAY. NEXT DAY WHILE DRIVING ON A STRAIGHT ROAD SAME WARNING LIGHT INDICATION AND POWER STEERING FAILED. PUT TRANSMISSION IN NEUTRAL TURNED IGNITION OFF THEN BACK ON AND PROBLEM WENT AWAY. TOOK VEHICLE TO DEALER SEVERAL DAYS LATER FOR REPAIR. DEALER TOLD ME FOUR SOFTWARE UPDATES WERE INCORPORATED. PROBLEM OCCURRED AGAIN ABOUT FOUR WEEKS LATER WHILE DRIVING ON A STRAIGHT ROAD ABOUT A HALF HOUR AFTER ENCOUNTERING A MODERATE RAIN SQUALL. RETURNED VEHICLE TO DEALER THREE WEEKS AGO AND THEY STILL HAVE THE VEHICLE IN THEIR SHOP. I HAVE RECEIVED NO INFORMATION AS TO THE STATUS OF THE REPAIR EFFORT. I CONSIDER THIS PHENOMENA EXTREMELY DANGEROUS. I AM 6'3" AND WEIGH 250 POUNDS. WHEN THE POWER

STEERING FAILS IT IS ALL I CAN DO TO KEEP THE VEHICLE UNDER CONTROL.

- 1. PURCHASED THIS VEHICLE NEW FORM DEALERSHIP.
- 2. ON DATE I LISTED WHILE DRIVING A STRAIGHT RURAL ROAD (ABOUT 15 MINUTES OF DRIVING) THE "SERVICE" INDICATOR LIGHT CAME ON WITH MESSAGE STATING THAT POWER STEERING WAS NOT WORKING, ALONG WITH SEVERAL OTHER INDICATOR LIGHTS- TIRE PRESSURE/TRACTION CONTROL???
- 3. MY CONCERN- IF YOU ARE GOING STRAIGHT CAR/TRUCK CAN BE STEERED WITH EFFORT. IT BECOMES ALMOST IMPOSSIBLE FOR ME (6'0" 180 LBS) TO STEER WHEN TURNING OR MANEUVERING. I HOPE THE DANGER IS APPARENT TO YOU FROM WHAT I HAVE STATED. WHEN I GOT TO MY DESTINATION (DROVE SLOW AND VERY CONTROLLED ON RURAL ROADS, 15 MINUTES) I DID SOME ERRANDS WITH THE PLAN TO GET THE TRUCK IN FOR SERVICE. WHEN I CAME OUT TO LEAVE, STARTED TRUCK- EVERYTHING WAS BACK TO NORMAL- LIKE NOTHING EVER HAPPENED.
- 4. TODAY, JUNE 26, OUT DOING ERRANDS- SAME SCENARIO OCCURRED- NO WARNING EXCEPT FOR "SERVICE" INDICATOR IN MIDDLE OF MY DRIVE- NO POWER STEERING. AGAIN- VERY DIFFICULT TO STEER AND MANEUVER. EVERYTHING IS FINE, BACK TO NORMAL, WHEN I STOPPED AND RE-STARTED THE TRUCK.
- 5. GMC SAID THEIR POWER STEERING IS NEW ON THE THIS VEHICLE- "ELECTRONIC" NO BELT, ETC.
- 6. ALMOST SEEMS LIKE A COMPUTER ISSUE, LIKE A RE-BOOT ON THE SYSTEM, WHEN THE ENGINE IS TURNED OFF AND THEN RE-STARTED.
- 7. IF THIS SITUATION WOULD OCCUR TO OTHERS- PEOPLE COULD DIE AS THE RESULT OF ACCIDENTS. PLEASE

CHECK INTO THIS AND SEE IF THERE MAY BE A PROBLEM WITH THE ELECTRONIC STEERING/COMPUTER ON THE GMC CANYON CHEVROLET COLORADO. UPDATED 10/31/2017*CN

- FEBRUARY 2017 (34141 MILES) - LOST POWER STEERING SUDDENLY WHILE DRIVING AT HIGHWAY SPEED W/"POWER STEERING SERVICE" WARNING. PULLED OVER W/DIFFICULTY, SHUT DOWN, RESTARTED, PROBLEM SEEMED TO DISAPPEAR. HAD CODE RED AT LOCAL CHEVY DEALERSHIP, NO CHARGE, ADVISED TO RETURN IF ISSUE REURRED.

MAY 2017 (38494 MILES) - SAME ISSUE. RETURNED TO SAME CHEVY DEALERSHIP, DIAGNOSED "POOR CONNECTION IN TORQUE SENSOR HARNESS", INSTALLED SL-N-HOUSING KIT USING N-LUBRICANT AND STATED IT WAS COVERED BY WARRANTY.

JULY 2019 (71474 MILES) - IDENTICAL ISSUE (DRIVING, HIGHWAY SPEED, POWER STEERING LOST W/"POWER STEERING SERVICE" WARNING, AND ADDITIONALLY TRACTION CONTROL LOSS WARNING). PULLED OVER W/DIFFICULTY. SHUTDOWN, ISSUE RESOLVED ON RESTART.

SAME DAY - WENT TO SAME CHEVY DEALER, TOLD TO RETURN THE NEXT AM DUE TO SCHEDULING.

10 JULY 2019 - RETURNED TO SAME CHEVY DEALER. AFTER 2+ HOURS OF INSPECTION WAS INFORMED THE SENSOR COULD NOT BE REPLACED ALONE AND THAT A LARGE PORTION OF THE STEERING COLUMN HAD TO BE ENTIRELY REPLACED DUE TO THE FAILING "TORQUE SENSOR HARNESS" W/REPAIRS/PARTS ESTIMATED AT OVER \$2000.00. WHEN I SUGGESTED THAT THIS MAY BE A RECALL ISSUE I WAS INFORMED THAT THE MONTH MY 2015 WAS BUILT WAS NOT PART OF THE RECALL EVEN THOUGH THE PROBLEM IS ESSENTIALLY THE SAME.

NOTE: THE ABOVE VEHICLE IS AND HAS BEEN ALMOST EXCLUSIVELY DRIVEN ON WELL MAINTAINED ROADS W/NO AGGRESSIVE OFF ROAD USE/ABUSE.

- ON 4 SEPARATE OCCASIONS IN THE PAST MONTH I HAVE LOST POWER STEERING. NO CODES ARE ISSUED ONLY LIGHTS ON THE DASH STATING "SERVICE POWER STEERING" AND "SERVICE SABILITRACK". THE FIRST 2 INCIDENTS OCCURRED ON A STRAIGHT STRETCH OF HIGHWAY AT 45 MPH, 1 INCIDENT OCCURRED IN A PARKING LOT AT 15 MPH. THESE 3 WERE MANAGEABLE BUT THE 4TH OCCURRED IN A CURVE AT 45 MPH. THIS ONE TOOK ALL I HAD TO KEEP THE VEHICLE FROM GOING OFF THE ROAD AND DOWN AN EMBANKMENT. IN ALL INCIDENTS THE VEHICLE WAS STOPPED, TURNED OFF AND RESTARTED SHORTLY AFTER THE LOSS AND THE PROBLEM WAS GONE. VEHICLE IS SCHEDULED INTO A LOCAL CHEVY DEALER TO SEE WHAT THEY SAY IS WRONG.
- FEBRUARY 2017 (34141 MILES) - LOST POWER STEERING SUDDENLY WHILE DRIVING AT HIGHWAY SPEED W/"POWER STEERING SERVICE" WARNING. PULLED OVER W/DIFFICULTY, SHUT DOWN, RESTARTED, PROBLEM SEEMED TO DISAPPEAR. HAD CODE RED AT LOCAL CHEVY DEALERSHIP, NO CHARGE, ADVISED TO RETURN IF ISSUE RECURRED.

MAY 2017 (38494 MILES) - SAME ISSUE. RETURNED TO SAME CHEVY DEALERSHIP, DIAGNOSED "POOR CONNECTION IN TORQUE SENSOR HARNESS", INSTALLED SL-N-HOUSING KIT USING N-LUBRICANT AND STATED IT WAS COVERED BY WARRANTY.

JULY 2019 (71474 MILES) - IDENTICAL ISSUE (DRIVING, HIGHWAY SPEED, POWER STEERING LOST W/"POWER STEERING SERVICE" WARNING, AND ADDITIONALLY TRACTION CONTROL LOSS WARNING). PULLED OVER W/DIFFICULTY. SHUTDOWN, ISSUE RESOLVED ON RESTART.

SAME DAY - WENT TO SAME CHEVY DEALER, TOLD TO RETURN THE NEXT AM DUE TO SCHEDULING.

10 JULY 2019 - RETURNED TO SAME CHEVY DEALER. AFTER 2+ HOURS OF INSPECTION WAS INFORMED THE SENSOR COULD NOT BE REPLACED ALONE AND THAT A LARGE PORTION OF THE STEERING COLUMN HAD TO BE ENTIRELY REPLACED DUE TO THE FAILING "TORQUE SENSOR HARNESS" W/REPAIRS/PARTS ESTIMATED AT OVER \$2000.00. WHEN I SUGGESTED THAT THIS MAY BE A RECALL ISSUE I WAS INFORMED THAT THE MONTH MY 2015 WAS BUILT WAS NOT PART OF THE RECALL EVEN THOUGH THE PROBLEM IS ESSENTIALLY THE SAME.

NOTE: THE ABOVE VEHICLE IS AND HAS BEEN ALMOST EXCLUSIVELY DRIVEN ON WELL MAINTAINED ROADS W/NO AGGRESSIVE OFF ROAD USE/ABUSE.

- ON 4 SEPARATE OCCASIONS IN THE PAST MONTH I HAVE LOST POWER STEERING. NO CODES ARE ISSUED ONLY LIGHTS ON THE DASH STATING "SERVICE POWER STEERING" AND "SERVICE SABILITRACK". THE FIRST 2 INCIDENTS OCCURRED ON A STRAIGHT STRETCH OF HIGHWAY AT 45 MPH, 1 INCIDENT OCCURRED IN A PARKING LOT AT 15 MPH. THESE 3 WERE MANAGEABLE BUT THE 4TH OCCURRED IN A CURVE AT 45 MPH. THIS ONE TOOK ALL I HAD TO KEEP THE VEHICLE FROM GOING OFF THE ROAD AND DOWN AN EMBANKMENT. IN ALL INCIDENTS THE VEHICLE WAS STOPPED, TURNED OFF AND RESTARTED SHORTLY AFTER THE LOSS AND THE PROBLEM WAS GONE. VEHICLE IS SCHEDULED INTO A LOCAL CHEVY DEALER TO SEE WHAT THEY SAY IS WRONG.
- I HAVE A 2015 CHEVROLET COLORADO WITH ABOUT 54,000 MILES AND PURCHASED IT USED IN 2018 FROM POHANKA CHEVROLET WITH ABOUT 22,000. WHILE DRIVING UNDER NORMAL HIGHWAY CONDITIONS ON JULY 02, 2019, MY TRUCK EXPERIENCED AN ABRUPT LOSS OF POWER

STEERING. I WAS ABLE TO SAFELY STOP ON THE SIDE OF THE HIGHWAY, TURN OFF THE VEHICLE, AND RESTART THE VEHICLE. POWER STEERING FUNCTION RETURNED. I INSPECTED THE POWER STEERING FLUID AND NOTED THAT THERE WAS A SUFFICIENT AMOUNT IN THE RESERVOIR. I CONTINUED DRIVING WITH NO ISSUE UNTIL TWO DAYS LATER WHEN THE SAME PROBLEM OCCURRED AGAIN WHILE DRIVING. I STOPPED ON THE SIDE OF THE ROAD AND RESTARTED THE VEHICLE LIKE BEFORE WITH THE POWER STEERING RETURNING ON RESTART. HOWEVER, THE SAME ISSUE OCCURRED AGAIN WITHIN MINUTES OF DRIVING. IT HAPPENED A TOTAL OF FOUR TIES ON TWO SEPARATE DAYS. ON FRIDAY, 05 JULY I TOOK MY VEHICLE TO MY NORMAL CHEVROLET DEALERSHIP AND THEY DIAGNOSED THAT THE PROBLEM WAS DUE TO A MALFUNCTIONING STEERING GEAR TORQUE SENSOR THAT WOULD COST \$1,962 TO REPLACE. I RESEARCHED THE ISSUE FURTHER AND FOUND THAT THE EXACT SAME ISSUE WAS REPLICATED IN RECALL BULLETIN 15595A. HOWEVER, MY 2015 CHEVROLET COLORADO WAS NOT COVERED IN THAT RECALL. IT SEEMS POSSIBLE THAT THE ISSUE NOTED IN 15595A MAY HAVE BEEN MORE EXPANSIVE THAN WAS ORIGINALLY DISCOVERED.

- POWER STEERING ON MY 2015 CHEVY COLORADO AS WELL AS STABLE TRACK GOES OUT INTERMITTENTLY. IT CAN HAPPEN WHEN I'M DRIVING OR STARTING THE CAR. TURNING THE VEHICLE OFF AND ON AGAIN USUALLY FIXES THE ISSUE TEMPORARILY. TOOK THE VEHICLE TO THE MECHANIC AND CODES CO545, U0420, B1325 AND U04135 WHICH ARE THE STEERING WHEEL TORQUE SENSOR, INVALID DATA RECEIVED FROM POWER STEERING CONTROL MODULE, CONTROL MODULE POWER CURRENT VOLTAGE BELOW THRESHOLD, AND INVALID DATA RECEIVED FROM BRAKE CONTROL MODULE. THE TRUCK IS BARELY 4 YEARS OLD AND TO REPLACE THE PART WILL BE 2300. IT IS EXHIBITING THE SAME ISSUES AS THE RECALL IN 2016 AND SEARCHING AROUND I FIND MORE PEOPLE HAVING THE SAME ISSUES.

- TL* THE CONTACT OWNS A 2015 CHEVROLET COLORADO. WHILE DRIVING VARIOUS SPEEDS, THE POWER STEERING SEIZED AND VARIOUS UNKNOWN WARNING INDICATORS ILLUMINATED. WHEN THE VEHICLE WAS TURNED OFF AND RESTARTED, IT RESUMED NORMAL OPERATION. DURING THE MOST RECENT FAILURE, THE POWER STEERING FAILED TO RESET AND THE VEHICLE WAS TOWED TO RELIABLE CHEVROLET (9901 COORS BLVD NW, ALBUQUERQUE, NM 87114, 505-216-2993). THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOTIFIED AND THE CONTACT WAS INFORMED THAT THERE WERE NO RECALLS ON HER VEHICLE. THE FAILURE MILEAGE WAS APPROXIMATELY 60,000.
- LST POWER STEERING ON MY WAY HOME FROM WORK APRIL THE 23RD 2019. 2 CODES CAME UP ON THE SCREEN STABILITY TRACK ISSUE AND NO POWER STEERING PLEASE DRIVE WITH CAUTION. WAS ABLE TO DRIVE 3 MILES TILL I COULD PULL OFF THE ROAD, TURNED OFF THE VEHICLE RESTARTED CODES WERE GONE FROM THE SCREEN. WAS ABLE TO DRIVE THE VEHICLE 3 MILES TO MY HOUSE. NEXT MORNING LEFT FOR WORK DROVE 2 MILES FROM THE HOUSE SAME ISSUE OCCURRED HAD TO DRIVE ANOTHER 4 MILES TILL I COULD PULL OFF THE ROAD AS I LIVE IN A RURAL TOWN. TURN THE VEHICLE OFF TURNED IT BACK ON AND IT WAS ABLE TO DRIVE TO WORK WHEN I CONTACTED OUR LOCAL CHEVY GMC DEALER IN RUSSELL SPRINGS KENTUCKY. DIAGNOSIS WAS CODE C0545 TORQUE SENSOR FAULT FOUND ETERNAL SHORT IN THE SENSOR WHICH CAUSED NO POWER STEERING. COST ME \$1800 JURY PLACE THE STEERING GEAR AND MODULE IN FOR THEM TO REPROGRAM THE TORQUE SENSOR THE WIRING HARNESS HAD FAILED IT HAD SHORTED OUT. CONTACTED GMC CHEVY CUSTOMER SERVICE MY THEN NUMBER WAS NOT ON THE LIST FOR RECALL. CONTACTED DEALER FOR ADDITIONAL HELP THEY WERE NOT ABLE TO HELP ME. LOOKING FOR A TOTAL REFUND OF A \$1800 AS EVEN

THOUGH MY THE NUMBER IS NOT UNDER THE LIST THIS IS THE SAME ISSUE AS RECALL NUMBER 15595. PLEASE CONTACT ME [XXX] MY NAME IS [XXX]. I PURCHASED THIS VEHICLE FROM PHILLIP'S CHEVROLET IN FRANKFORT ILLINOIS FEBRUARY 2015.

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *CC *TR

- POWER STEERING GOES OUT VERY HARD TO STEER, A MAN CAN STILL STEER MY WIFE CAN NOT. STEERING STARTED GOING OUT AT ABOUT 35000 MILES. TRUCK WAS IN MOTION. SHUT OFF MOTOR AND RESTART STEERING WORKS . I HAD GM FIX IT COST 1900\$ GM PAID 1000\$ IF THEY NEW IT'S BAD THEY SHOULD RECALL OR PAY ALL OF COST
- TL* THE CONTACT OWNS A 2015 CHEVROLET COLORADO. WHILE DRIVING APPROXIMATELY 35 MPH, THE STEERING ABILITY SEIZED WITHOUT WARNING. THE CONTACT COASTED THE VEHICLE TO THE SIDE OF THE ROAD AND TURNED OFF THE ENGINE. ONCE RESTARTED, THE STEERING RETURNED TO NORMAL; HOWEVER, THE FAILURE REURRED THREE TIMES. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO DIAGNOSED THAT THE POWER STEERING MODULE FAILED AND NEEDED REPLACEMENT. THE DEALER AND MANUFACTURER WERE NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 60,000.

THE CONSUMER STATED THE FAILURE DID NOT APPEAR ON THE ON STAR COMPUTER SYSTEM BUT, THE DEALER WAS ABLE TO REPLICATE THE FAILURE. *JS

- TOTAL LOSS OF POWER STEERING ASSIST WITH "SERVICE POWER STEERING" MESSAGE ON SCREEN WHILE DRIVING AT HIGHWAY SPEEDS. ALSO LOSS OF ANTISKID AND STABILIRAK. VERY DANGEROUS CONDITION! CAN'T IMAGE WHAT MIGHT HAVE HAPPENED IF THIS FAILED IN A TURN. THE VEHICLE IS NOT DRIVABLE IN THIS CONDITION.

- TL* THE CONTACT OWNS A 2015 CHEVROLET COLORADO. WHILE OPERATING THE VEHICLE, THE POWER STEERING INTERMITTENTLY MALFUNCTIONED AND CAUSED THE STEERING WHEEL TO BECOME VERY DIFFICULT TO TURN IN EITHER DIRECTION. THE FAILURE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE LOCAL DEALER (DENECKER CHEVROLET, 510 US-7, MIDDLEBURY, VT) WAS NOTIFIED, BUT NO ASSISTANCE WAS OFFERED. THE FAILURE MILEAGE WAS 65,000. *BF
- THE POWER STEERING MAINTENANCE AND TRACTION CONTROL COMES ON WHILE DRIVING AND LOCKS UP THE STEERING.

I HAD TO PULL OVER IMMEDIATELY BECAUSE I WAS DRIVING ON A CITY STREET, TURNING INTO THE RESIDENTIAL AREA WHERE I LIVE. THE STEERING WAS HARD. I TURNED OFF THE VEHICLE RESTARTED AND THE WARNING MESSAGES WERE GONE AND I REGAINED THE POWER STEERING. THIS HAD HAPPENED TWICE WHILE DRIVING.

- THIS HAPPENED WHILE DRIVING ON THE CITY STREET AT A SPEED LIMIT OF 25MPH OR 55MPH AND WHILE TURNING ON A STREET. THE STEERING WHEEL GETS REALLY HARD, UNABLE TO MANEUVER. STEERING WHEEL STOP WORKING. THE POWER STEERING WARNING INDICATOR LIGHT UP. MESSAGE :(SERVICE POWER STEERING -DRIVE WITH CARE) WE WERE ABLE TO COAST TO THE SIDE OF THE ROAD AND POWER OFF ENGINE THEN RESTART. THE MANUFACTURER HAS BEEN NOTIFIED THREE TIMES, LAST YEAR AND THIS YEAR. PER GM THERE'S NOTHING IT CAN BE DONE TO FIX THE PROBLEM BECAUSE IT DOESN'T SHOW ANY CODE. WE TOOK THE VEHICLE TO PENSKE CHEVROLET MULTIPLE TIMES AND WE ALWAYS GET THE SAME ANSWER, THERE'S NOTHING WRONG, THEY CHECK AND NO DIAGNOSTIC CODE SHOW ON THE COMPUTER. THEY ONLY DID AN UPGRADE, BUT THAT DIDN'T SOLVE

THE PROBLEM.

- POWER STEERING GOES OUT AT ANY TIME NO WARNING HARD TO STEER A MAN CAN STEER IT MY WIFE CAN NOT
- TL* THE CONTACT OWNS A 2015 CHEVROLET COLORADO. WHILE DRIVING VARIOUS SPEEDS, THE STEERING WHEEL SEIZED AND THE POWER STEERING WARNING INDICATOR ILLUMINATED. THE CONTACT WAS ABLE TO COAST THE VEHICLE TO THE SIDE OF THE ROAD AND POWERED OFF THE ENGINE. THE VEHICLE WAS RESTARTED AND WAS ABLE TO DRIVE NORMALLY; HOWEVER, THE FAILURE REURRED TWICE. THE VEHICLE WAS LATER TAKEN TO AN INDEPENDENT MECHANIC WHERE DIAGNOSTIC TROUBLE CODES: C0545 (STEERING WHEEL TORQUE SENSOR MALFUNCTION) AND U0420 (POWER STEERING CONTROL MODULE) APPEARED. THE VEHICLE WAS NOT TAKEN TO A DEALER AND WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND PROVIDED CASE NUMBER: 9-5192152046. THE APPROXIMATE FAILURE MILEAGE WAS 50,000.
- WHILE DRIVING POWER STEERING IS DISABLED, WHEN I STOP THE VEHICLE AND RESTART THE POWER STEERING FUNCTIONS AGAIN. THIS HAS HAPPENED WHILE ON A HIGHWAY.
- MY TRUCK RANG 3 TIMES AND A PROMPT SHOWED UP ON THE DASH SAYING SERVICE POWER STEERING AND LOSS OF STABILITRACK. I WAS SITTING AT THE DRIVE THRU AND HAD TO PULL STRAIGHT INTO A PARKING SPOT BECAUSE TURNING THE VEHICLE BECAME PRETTY MUCH IMPOSSIBLE. MY TRUCK ONLY HAS 30,000 MILES ON IT.
- TL* THE CONTACT OWNS A 2015 CHEVROLET COLORADO. WHILE DRIVING AT AN UNKNOWN SPEED, THE SERVICE POWER STEERING WARNING INDICATOR ILLUMINATED AND THE VEHICLE BECAME DIFFICULT TO MANEUVER. WHEN THE VEHICLE WAS TURNED OFF AND RESTARTED, IT OPERATED NORMALLY. ON ANOTHER OCCASION, THE

SERVICE POWER STEERING WARNING INDICATOR ILLUMINATED, BUT THE STEERING REMAINED OPERATIONAL. THE VEHICLE WAS TAKEN TO GARY RUSS CHEVROLET (LOCATED AT 1420 SC-72, GREENWOOD, SC 29649, (864) 538-0376) TO BE DIAGNOSED, BUT THERE WERE NO CODES STORED IN THE ENGINE CONTROL MODULE. THE CONTACT WAS INFORMED THAT THERE WAS A SOFTWARE UPDATE FOR THE STEERING. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURES. THE APPROXIMATE FAILURE MILEAGE WAS 35,600.

- WHILE DRIVING ON A STRAIGHT ROADWAY AT 55 MPH THE POWER STEERING STOPED WORKING AND A TROUBLE SIGNAL TELLS ME TO BE CAREFUL, THAT MY POWER STEERING HAS STOPPED WORKING.
- POWER STEERING ASSISTANCE. NO POWER STEERING AT ALL. THIS QUOTE CAME ACROSS THE DIGITAL SPEEDOMETER "SERVICE POWER STEERING, DRIVE WITH CARE. WHILE WE WAS STOP A COUPLE OF DIFFERENT TIMES AND ALSO WHEN WE WAS DRIVING.
- POWER STEERING GOES COMPLETELY OUT
- POWER STEERING FAILURE. MY 2015 CHEVY COLORADO TRUCK, WITH 41,153 MILES, HAD A POWER STEERING FAILURE 4 DAYS AGO (MARCH 22, 2019). WHILE TRAVELING ON A DRY, SMOOTH ROAD AT 30 MPH AND WHILE BRAKING, THE STABILITRAK "OFF" WARNING LIGHT CAME ON, AS WELL AS A POWER STEERING ASSIST WARNING. THERE WAS AN IMMEDIATE LOSS OF POWER STEERING, AND THE STEERING WHEEL WAS VERY HARD TO TURN. INITIALLY I THOUGHT THE TRUCK HAD STALLED, BUT IT HAD NOT. I WAS ABLE TO MAKE 2 RIGHT-HAND TURNS AT SLOW SPEED TO GET OUT OF TRAFFIC AND INTO A PARKING LOT. I HAD TO USE A LOT OF MUSCLE TO STEER THE VEHICLE INTO THE LOT. I TURNED OFF THE TRUCK THEN RESTARTED AND THE WARNING LIGHTS WERE OFF AND POWER ASSIST RETURNED TO NORMAL OPERATION. I HAVE NOT HAD ANY PROBLEMS WITH THE TRUCK UNTIL THIS EPISODE. I CHECKED THE VIN NUMBER AGAINST A RECALL LIST AND

THERE IS NO CURRENT RECALL FOR THIS VEHICLE (THAT I'M AWARE OF). I'VE PLACED A CALL TO THE CHEVY DEALER SERVICE MANAGER AND I'M A WAITING FOR A RETURN CALL. IN THE MEANTIME MY WIFE IS AFRAID TO DRIVE THE VEHICLE, AND I KEEP BOTH HANDS ON THE STEERING WHEEL WONDERING IF IT'LL HAPPEN AGAIN UNDER LESS FAVORABLE CIRCUMSTANCES.

- TAKATA RECALL. MY 2015 COLORADO HAS EXPERIENCED A POWER STEERING FAILURE AFTER RECENTLY HAVING A STEERING ELECTRICAL RECALL REPAIR. I FEEL CHEVROLET IS AWARE THIS IS A MAJOR ISSUE AND A SAFETY ISSUE IN A LOT OF COLORADO'S. THIS SHOULD BE HANDLED AS A RECALL NOT A 2K DOLLAR REPAIR PUT BACK ON THE CONSUMER.
- POWER STEERING FAILED WHILE DRIVING AT SPEED ON THE FREEWAY IN A TURN. THERE ARE MANY RECALLS FOR THIS SAME THING ON THE SAME MODEL AND YEAR BUT NOT MY VIN#. RECALL SHOULD BE EXPANDED. CHEVROLET REDUCED THE AMOUNT FOR REPAIR FROM \$2100 TO \$800 BUT SHOULD BE COVERED IN A RECALL.

C. GM systematically refuses to disclose the known defect and refuses to honor its warranties to Class Members by repairing the known defect.

26. Class Vehicles were sold with a 3-Year / 36,000 Mile bumper-to-bumper warranty and a 5-Year / 60,000-Mile Powertrain Limited Warranty.

27. It is commonly understood that the electronic power steering torque assists sensor in passenger vehicles like the Class Vehicles are meant to last the lifetime of the vehicle. *See, e.g., Valerie Johnston, "How Long Does a Power Steering Pump Last?", Your Mechanic, Jan. 15, 2016, available at*

<https://www.yourmechanic.com/article/how-long-does-a-power-steering-pump-last>

(last accessed August 02, 2019) (Exhibit 7). Reasonable consumers expect that a vehicle's electronic power steering torque assist sensor—which isn't part of regular maintenance and service—will last the lifetime of the vehicle. The typical car on the road in the United States is 11.5 years old. The number of vehicles 16 to 24 years old is 44 million. The number of vehicles on the road at least 25 years old is about 14 million.

28. A reasonable consumer is damaged by the substantial cost in time and money of attempting to diagnose and fix the Power Steering Assist defect.

29. Many purchasers and lessees of Class Vehicles have spent hundreds of dollars or more on defect-related repairs and related expenses.

30. The mileage and durational limitations in GM's Limited Warranty, as applied to Plaintiff and Class Members, are unconscionable. GM knew about the inherent defect in the electronic power steering torque assist sensor at various points, including: (1) when it designed and manufactured the electronic power steering torque assist sensor and performed pre-sale testing and validation, (2) when individuals began to lodge complaints with NHTSA, and (3) before Plaintiff and the Class purchased their GM vehicles and/or paid for repairs that were not covered under warranty. Still, GM opted not to warn, disclose, or otherwise inform the potential or eventual purchasers about the defect. GM continues to refuse disclosure

of this known defect to this date on newly sold Class Vehicles.

31. GM has never disclosed the defect to drivers or potential purchasers or lessees of Class Vehicles, and GM has inadequately instructed its dealerships to disclose the defect to drivers or potential purchasers or lessees of Class Vehicles.

32. The defect was not known to or reasonably discoverable by the Plaintiff and proposed Class Members before purchase or lease, or without experiencing the defect first-hand and exposing themselves to an unreasonable safety risk.

33. GM has inadequately responded even as it has and learned of at least hundreds of complaints about Class Vehicles directly from its customers, through its dealers, and from NHTSA.

34. Because of GM's inadequate action and silence, many consumers are unaware that they purchased, and continue to drive, unsafe and unreliable vehicles. As GM knows, a reasonable person would consider the defect important and would either not purchase or lease a vehicle with the defect were the defect disclosed in advance or would pay substantially less for the vehicle.

35. Plaintiff and the putative Class neither knew, nor could have known, about the defective nature of the electronic power steering torque assist sensor at the time they purchased their Class Vehicles. GM knowingly manufactured vehicles that contained an inherent defect but did not inform Plaintiff of the problem when Plaintiff agreed to purchase the Class Vehicle or any time thereafter. GM has

vigorously refused to acknowledge that the electronic power steering torque assist sensor are the source of the defect to avoid having to pay for a replacement with a non-defective electronic power steering torque assist sensor under its Limited Powertrain Warranty. GM intentionally limited the company's liability for the known defect, and Plaintiff and putative Class Members never could bargain for a warranty that would have covered the defect because they did not know of its existence. GM's material omission concerning the defect rendered the warranty unconscionable as applied to Plaintiff and Class Members.

PLAINTIFF'S EXPERIENCE

36. On or about June 9, 2016, Plaintiff Mike Woronko purchased a new 2016 Chevrolet Colorado from Bill Crispin Chevrolet in Saline, Michigan. Mr. Woronko's Colorado came with a defective electronic power steering torque assist sensor that made it susceptible to the Power Steering Assist defect. GM did not disclose this to Mr. Woronko, who greatly values vehicle safety and who wanted, and paid for, a fully functional vehicle.

37. From the date of purchase to the present, Plaintiff has serviced his vehicle in a timely and proper manner.

38. Mr. Woronko experienced the Power Steering Assist defect in or around July 2019 when his vehicle had approximately 56,000 miles on it. Mr. Woronko attempted to back his vehicle out of his driveway when the steering failed

to work and the dashboard light came on. Mr. Woronko turned the car off and on to see if the dashboard message would reset.

39. After that, Mr. Woronko had his vehicle towed to the Kool Chevrolet, Inc. dealership for diagnosis and repair. Among other things, the Waldorf dealership found that the vehicle displayed the power steering message and needed a new steering rack assembly. The Grand Rapids dealership listed a total charge of \$1,874.99 for this diagnosis and repair work, which was not covered by GM's warranty.

40. General Motors, through its franchised dealership, refused to honor its warranty and instead denied that Mr. Woronko's vehicle Power Steering Assist defect results from a widespread defect long known to GM.

41. Mr. Woronko has never received a reimbursement for his out of pocket expenses.

CLASS ACTION ALLEGATIONS

42. Under Fed. R. Civ. P. 23(b)(2) and (b)(3), Plaintiff intends to seek certification of a Nationwide Class consisting of:

All persons who purchased or leased in the United States a 2015 through 2016 Chevrolet Colorado and GMC Canyon vehicle manufactured before January 6, 2015 or after March 17, 2015.

Plaintiff also intends to seek certification of a Michigan Sub-Class consisting of:

All natural persons who purchased or leased in Michigan a 2015 through 2016 Chevrolet Colorado and GMC Canyon vehicle manufactured before January 6, 2015 or after March 17, 2015.

43. Excluded from each proposed class are: General Motors, any affiliate, parent, or subsidiary of GM; any entity in which GM has a controlling interest; any officer, director, or employee of GM; any successor or assign of GM; anyone employed by counsel for Plaintiff in this action; any judge to whom this case is assigned, her or her spouse, and all persons within the third degree of relationship to either of them, and the spouses of such persons; and anyone who purchased a Class Vehicle for resale.

NUMEROSITY

44. The members of the classes are so numerous that joinder of all members is impracticable. While the precise number of Class Members can only be confirmed through discovery, it is estimated that at least hundreds of thousands of persons purchased or leased Class Vehicles.

COMMON QUESTIONS OF LAW AND FACT PREDOMINATE

45. There is a well-defined community of interest in the questions of law and fact affecting the Class Members.

46. There are questions of law and fact common to all members of each Class: specifically, Plaintiff's claims arise from the same event or practice or course of conduct by the Defendant that gives rise to those claims of the putative classes,

and Plaintiff's claims are based upon the same legal theories as those of the putative classes. The Defendant has engaged in a pattern and practice, in violation of the law, of not informing all purchasers or potential purchasers of the known defect in the Class Vehicles. The resolution of this issue—to wit, whether Defendant knew about the defect and did not inform Plaintiff and Class Members—is a common question of fact and law that will affect all members of the class in the same manner.

47. The questions of law and fact common to the Class predominate over questions that may affect individual members, and include:

- a. Whether General Motors disclosed the known Class Defect to Class Members prior to their purchase;
- b. Whether General Motors violated state consumer protection laws by concealing the known Class Defect;
- c. Whether Class Members are entitled to actual damages and, if so, the appropriate amount;
- d. Whether members of the classes may be notified and warned about the defect and may have the entry of final and injunctive relief compelling General Motors to issue a notification and warning to all Class Members about such a defect;
- e. Whether General Motors deliberately failed to disclose material facts to Plaintiff and the Class Members; and

f. Whether Defendant manufactured defective electronic power steering torque assist sensors and should replace them at no cost to Plaintiff and the Class Members.

TYPICALITY

48. The claims and defenses of the Named Plaintiff are representative of the Class Members he seeks to represent and typical of the claims and defenses of the class because the Plaintiff and the Class Members all owned Class Vehicles with defective electronic power steering torque assist sensors that were manufactured and sold by Defendant. Plaintiff, like all Class Members, purchased a Class Vehicle without having received any warning or notification from Defendant of the defect.

ADEQUACY OF REPRESENTATION

49. The Named Plaintiff will fairly and adequately assert and protect the interests of the proposed class because:

- a. Plaintiff has hired attorneys who are experienced in prosecuting class action claims and will adequately represent the interests of the classes;
- b. Plaintiff has no conflict of interest that will interfere with the maintenance of this class action; and
- c. Plaintiff has suffered consumer-related injuries and damages.

SUPERIORITY

50. A class action provides a fair and efficient method for the adjudication of the instant controversy for the following reasons:

- a. The common questions of law and fact set forth above predominate over questions affecting only individual Class Members;
- b. The proposed classes are each so numerous that joinder would prove impracticable. The proposed classes, however, are not so numerous as to create manageability problems; moreover, no unusual legal or factual issues render the class unmanageable.
- c. Prosecution of separate actions by individual members of the class would risk inconsistent and varying adjudications against Defendant;
- d. The claims of the individual Class Members are small in relation to the expenses of litigation, making a class action the only procedure in which Class Members can, as a practical matter, recover for the damages done to them by GM.
- e. A class action would be superior to, and more efficient than, adjudicating thousands of individual lawsuits.

51. In the alternative, the proposed classes may be certified because:

- a. The prosecution of separate actions by the individual members of the proposed classes would create a risk of inconsistent or varying adjudication regarding individual Class Members, which would establish incompatible standards of conduct for GM;
- b. The prosecution of separate actions by individual Class Members would create a risk of adjudications dispositive of the interests of other Class Members not parties to the adjudications and substantially impair or impede their ability to protect their interests; and
- c. GM has acted or refused to act on grounds generally applicable to the proposed class, which justifies final and injunctive relief for the members of the proposed class as a whole.

ESTOPPEL FROM PLEADING AND TOLLING OF APPLICABLE STATUTES OF LIMITATIONS

52. Defendant General Motors LLC has possessed exclusive knowledge about the Class Defect, including from its customer complaint and warranty records, internal emails, reports, analyses, and assessment of engineers, that is unavailable to Plaintiff and the proposed Class Members.

53. GM is estopped from relying on any statutes of limitation or repose due to its acts of concealment. Defendant knew about the defect in the Class Vehicles for years but concealed it and/or failed to alert purchasers or potential purchasers. Defendant maintained exclusive control over information concerning the known, but

non-public, defect and the number of Class Vehicles at issue; Plaintiff and Class Members, therefore, could not reasonably have known about the defect or the number of Class Vehicles affected. Defendant is estopped from relying on any statutes of limitations or repose that might otherwise apply to the claims asserted herein.

EXPRESS AND IMPLIED WARRANTIES

54. For each Class Vehicle sold by GM, an express written warranty was issued which covered the vehicle, including but not limited to, the powertrain and electronic power steering torque assist sensor, and GM warranted the vehicle to be free of defects in materials and workmanship at the time of purchase or lease.

55. Pursuant to its express and written warranties, GM warranted the Class Vehicles' powertrain, including the powertrain and electronic power steering torque assist sensor, to be free of defects in design, materials, and workmanship and that repairs and other adjustments would be made by authorized dealers, without charge, to correct defects in materials or workmanship which occurred during the first 3 years or 36,000 miles, whichever came first, and 5 years or 60,000 miles for the powertrain, whichever came first.

56. GM also sold or leased the Class Vehicles to Class Members under implied warranties of merchantability and fitness for a particular purpose. GM impliedly warranted the Class Vehicles to be merchantable, fit for the ordinary

purposes for which they were intended to be used, including the guarantee that they were in a safe and non-defective condition for use by their owners or lessees for the ordinary purpose for which they were intended and were not otherwise injurious. GM is under a duty to design, construct, manufacture, inspect, and test the Class Vehicles so as to make them suitable for the ordinary purposes of their use—transportation at interstate speeds.

57. GM breached its warranties for the Class Vehicles as a result of the latent defects in the powertrain; denying the defect in the powertrain when confronted with complaints of loss of power steering; failing to repair the vehicles as warranted; and otherwise inadequately repairing the defect through ineffective repairs or replacement of the defective electronic power steering torque assist sensor with an equally defective electronic power steering torque assist sensor.

58. In breach of GM's warranties, the Class Vehicles are defective, unsafe, unfit for the ordinary purposes for which they are intended to be used, and not merchantable.

FIRST CLAIM FOR RELIEF
Violation of the Magnuson-Moss Warranty Act
15 U.S.C. §§ 2301, *et seq.*
(Nationwide Class)

59. Plaintiff, individually and for the Nationwide Class, hereby incorporates each and every allegation as though fully set forth herein.

60. For each Class Vehicle, GM issued an express written warranty that

covered the vehicle, including but not limited to the drivetrain and powertrain, and which warranted the vehicle to be free of defects in materials and workmanship at the time of delivery.

61. GM breached its express warranties by offering for sale and selling defective vehicles that were by design and construction defective and unsafe, thereby subjecting the occupants of the Class Vehicles purchased or leased to damages and risks of loss and injury.

62. Plaintiff and members of the class are “consumers” within the meaning of the Magnuson-Moss Act, 15 U.S.C. § 2301(3).

63. Defendant GM is a “supplier” and “warrantor” within the meaning of the Magnuson-Moss Act, 15 U.S.C. § 2301(4) and (5).

64. The Class Vehicles at issue are “consumer products” within the meaning of the Magnuson-Moss Act, 15 U.S.C. § 2301(6).

65. Defendant GM’s written and implied warranties relate to the future performance of its vehicles because it promised that the powertrain of the Class Vehicles would perform adequately for a specified period of time or mileage, whichever came first.

66. Defendant GM has breached and continues to breach its written and implied warranties of future performance, thereby damaging Plaintiff and similarly situated Nationwide Class members, when their Class Vehicles fail to perform as

represented due to an undisclosed powertrain defect. GM fails to fully cover or pay for necessary inspections, repairs and/or vehicle replacements for Plaintiff and the Nationwide Class.

67. Plaintiff, members of Nationwide Class, and the public will suffer irreparable harm if GM is not ordered to properly repair all of the Class Vehicles immediately, offer rescission to the Nationwide Class by repurchasing their Class Vehicles for their full cost, reimburse the lessees of the Class Vehicles the monies they have paid toward their leases, recall all defective vehicles that are equipped with the defective electronic power steering torque assist sensor, and cease and desist from marketing, advertising, selling, and leasing the Class Vehicles.

68. GM is under a continuing duty to inform its customers of the nature and existence of potential defects in the vehicles sold.

69. Such irreparable harm includes but is not limited to likely injuries as a result of the defects to the Class Vehicles.

SECOND CAUSE OF ACTION
Breach of Express Warranties
(On behalf of the Nationwide Class or, alternatively,
on behalf of the Michigan Sub-Class)

70. Plaintiff, individually and on behalf of the Nationwide Class or, alternatively, on behalf of the Michigan Sub-Class, hereby incorporates each and every allegation as though fully set forth herein.

71. Plaintiff brings this count on behalf of himself and the Nationwide

Class or, alternatively on behalf of the Michigan Sub-Class.

72. For each Class Vehicle sold by GM, an express written warranty was issued that covered the vehicle, including but not limited to the powertrain, and which warranted the vehicle to be free of defects in materials and workmanship at the time of delivery.

73. GM breached its warranties by offering for sale and selling defective vehicles that were by design and construction defective and unsafe, thereby subjecting the occupants of the Class Vehicles purchased or leased to damages and risks of loss and injury.

74. GM's breach of its express warranties proximately caused the Plaintiff and members of the Nationwide Class or, alternatively, Plaintiff and members of the Michigan Sub-Class to suffer damages in excess of \$5,000,000.00.

THIRD CLAIM FOR RELIEF
Breach of Implied Warranties
**(On behalf of the Nationwide Class or, alternatively,
on behalf of the Michigan Sub-Class)**

75. Plaintiff, individually and on behalf of the Nationwide Class or, alternatively, on behalf of the Michigan Sub-Class, hereby incorporates each and every allegation as though fully set forth herein.

76. Plaintiff brings this count on behalf of himself and the Nationwide Class or, alternatively, on behalf of the Michigan Sub-Class.

77. GM impliedly warranted that the Class Vehicles, which it designed,

manufactured, sold, or leased to Plaintiff and members of the Nationwide Class and Michigan Sub-Class, were merchantable, fit and safe for their ordinary use, not otherwise injurious to consumers, and would come with adequate safety warnings.

78. Because the Class Vehicles are equipped with the defective electronic power steering torque assist sensor, the vehicle purchased or leased and used by Plaintiff, Nationwide Class, and Michigan Sub-Class members is unsafe, unfit for use when sold, threatens injury to its occupants, and is not merchantable. GM breached the implied warranty of merchantability in the sale or lease of the Class Vehicles to Plaintiff and members of the Michigan Sub-Class in that the vehicles were not fit for their ordinary purpose and not merchantable.

79. Plaintiff put GM on notice of the breach of implied warranty. Specifically, Plaintiff complained to the dealership at the time that his vehicle suffered the defect and when he was charged \$1,874.99 in repair costs. Despite these complaints, GM did nothing to remedy the defect or to reimburse Mr. Woronko for his repair costs.

80. As a direct and proximate result of GM's breach of the implied warranty of merchantability and fitness for a particular purpose, Plaintiff and members of the Nationwide Class or, alternatively, Plaintiff and members of the Michigan Sub-Class suffered damages in excess of \$5,000,000.00.

FOURTH CAUSE OF ACTION
Violation of the Michigan Consumer Protection Act (“MCPA”)
Michigan Comp. Laws Ann., § 445.903 *et seq.*
(Michigan Sub-Class)

81. Plaintiff, individually and for the Michigan Sub-Class, hereby incorporates each and every allegation as though fully set forth herein.

82. Plaintiff brings this claim individually and on behalf of the Michigan Sub-Class.

83. Plaintiff and Class Members who purchased or leased Class Vehicles are “consumers” under MCPA.

84. The Vehicles are consumer goods within the meaning of the MCPA and provided services within the MCPA’s meaning of the term consumer services.

85. The MCPA prohibits the use of any “unfair or deceptive trade practice” in the sale or lease of any consumer goods or services.

86. GM violated the MCPA by, *inter alia*, engaging in the following unfair deceptive acts or practices:

- a. Failing to disclose material facts that deceived and had the tendency to deceive; and
- b. Engaging in deception, fraud, false pretense, false premise, misrepresentation, or knowing concealment, suppression, or omission of any material fact with the intent that a consumer rely on the same in connection with: (i) the promotion or sale of consumer goods or

services; or (ii) the subsequent performance of a merchant with respect to an agreement of sale or lease.

87. GM violated the MCPA by concealing, suppressing or omitting material facts regarding the Vehicles, including, but not limited to, the fact that the Vehicles' electronic power steering torque assist sensor is defective, that as a result of such defect, the Vehicles' defective electronic power steering torque assist sensor fails prematurely, and that the cost of replacing or repairing the defective electronic power steering torque assist sensor is high. This concealed or omitted information is the type of information upon which a consumer would be expected to rely on in making a decision whether to purchase, or how much to pay for, the Vehicles.

88. GM concealed, suppressed or omitted these material facts in conducting trade and commerce with the intent that Plaintiff and the Michigan Class would rely on the omissions in the purchase or lease of their Vehicles.

89. To this day, GM continues to violate the MCPA by actively concealing the material information about the Vehicles and their electronic power steering torque assist sensor and by representing to Plaintiff and members of the Michigan Class that the Vehicles are defect-free and safe.

90. GM intended that Plaintiff and the Michigan Class members would rely on its concealment and omission of material facts, which occurred in the course of conduct involving trade and commerce.

91. Defendant's practices, acts, policies and course of conduct violated MCPA's prohibition on unfair and deceptive conduct in that:

a. At the time of sale, Defendant knowingly and intentionally omitted and concealed material information regarding the Class Vehicles by failing to disclose to Plaintiff and Class Members the defective electronic power steering torque assist sensor and the associated Power Steering Assist defect.

b. Thereafter, Defendant failed to disclose the defect to Plaintiff and the Class Members, either through warnings or recall notices, and/or actively concealed from them that the Class Vehicles' electronic power steering torque assist sensors were defective, even though the company knew of such defects:

(1) at the time of manufacture, when it created the electronic power steering torque assist sensor in a manner unable to provide for consistently stable driving; (2) from complaints to NHTSA and to web forums actively monitored by GM; (3) when, on information and belief, GM's internal analyses determined the ubiquity of the problem upon learning that the power steering torque assist sensors were on backorder.

c. Based on these and, upon information and belief, other internal studies and investigations, Defendant knew with certainty that the electronic power steering torque assist sensor on the Class Vehicles would be

compromised and that the Class Vehicles would have the Power Steering Assist defect.

d. Nonetheless, Defendant forced Plaintiff and Class Members to expend money at its dealerships on diagnosis and ineffectual repairs and part replacements on the Class Vehicles, despite Defendant's prior knowledge of the defect.

e. Defendant, in administering its limited warranty, engaged in materially misleading deceptive acts and practices by classifying the defect as not involving the powertrain, but rather, other parts, so as to place the defect outside of warranty coverage. When Defendant did cover electronic power steering torque assist sensor repairs and replacements under the warranty, it replaced the defective part with equally defective units.

92. Furthermore, Defendant engaged in materially misleading and deceptive acts by continuing to sell the Class Vehicles to the consuming public and to represent that these vehicles were in good working order, merchantable, and not defective, despite Defendant's knowledge that the vehicles would not perform as intended, represented, and warranted and that the above described defects would cause purchasers to incur significant out-of-pocket costs and expenses.

93. Defendant's acts and omissions are unfair in that they (1) offend public policy; (2) are immoral, unethical, oppressive, or unscrupulous; and (3) cause

substantial injury to consumers. Defendant has, through knowing, intentional, material omissions, concealed the true defective nature of the Class Vehicles.

94. Defendant's acts and omissions are also unfair in that they cause substantial injury to consumers far in excess of any conceivable benefit; and are injuries of a nature that they could not have been reasonably avoided by consumers.

95. As a direct and proximate result of these unfair acts or practices, Plaintiff and Class Members have been damaged because: they purchased Class Vehicles they otherwise would not have, paid more for Class Vehicles than they otherwise would have, paid for diagnoses, repairs, and replacements, towing, and/or rental cars, and are left with Class Vehicles of diminished value and utility because of the defect. Meanwhile, GM has sold more Class Vehicles than it otherwise could have and charged inflated prices for Class Vehicles, thereby unjustly enriching itself.

96. Plaintiff and Class Members seek restitution of the substantial sums of money they expended to diagnose and repair the defect in their Class Vehicles, which Defendant knew about prior to their sale.

97. Plaintiff and Class Members also seek appropriate equitable relief, including an order requiring GM to adequately disclose and remediate the defect and an order enjoining GM from incorporating the defective electronic power steering torque assist sensor into its vehicles in the future.

FIFTH CAUSE OF ACTION
Unjust Enrichment
(Nationwide Class and Michigan Sub-Class)

98. Plaintiff incorporates by reference the allegations contained in the preceding paragraphs of this Complaint to the extent not inconsistent with the claims asserted in this Count.

99. This claim is asserted in the alternative on behalf of Plaintiff and the members of the Classes to the extent that there is any determination that Plaintiff does not have standing to assert any contractual claims asserted against GM on the alleged basis of absence of contractual privity or otherwise.

100. By its wrongful acts and omissions described herein, including selling the Vehicles with defective electronic power steering torque assist sensors, GM was unjustly enriched at the expense of Plaintiff and the Classes.

101. Plaintiff and the Class members conferred a benefit upon GM by purchasing the Vehicles at the full price for fully functional vehicles equipped with appropriate and working electronic power steering torque assist sensors.

102. GM knew that the Classes were purchasing the Vehicles and still accepted the sum contemplated for fully functional vehicles equipped with appropriate and working electronic power steering torque assist sensors.

103. Under the circumstances, it would be inequitable for GM to retain the profits, benefits, and other compensation obtained through its wrongful conduct in

manufacturing, marketing and selling the Vehicles with defective electronic power steering torque assist sensor to Plaintiff and the Classes. Natural justice and equity require that Plaintiff and the Classes recover under the circumstances.

104. Plaintiff, on behalf of himself and all others similarly situated, seeks restitution from GM, and an order of this Court proportionally disgorging all profits, benefits, and other compensation wrongfully obtained by GM from its conduct.

SIXTH CAUSE OF ACTION
Fraudulent Concealment
**(On behalf of the Nationwide Class or, alternatively,
on behalf of the Michigan Sub-Class)**

105. Plaintiff incorporates by reference the allegations contained in the preceding paragraphs of this Complaint to the extent not inconsistent with the claims asserted in this Count.

106. Plaintiff brings this count on behalf of himself and the Nationwide Class or, alternatively, on behalf of the Michigan Sub-Class.

107. GM intentionally and knowingly concealed, suppressed and/or omitted material facts including the presence of the defective electronic power steering torque assist sensor.

108. GM knew (at the time of sale or lease and thereafter) that the Vehicles contained the electronic power steering torque assist sensor defect, concealed the defect, and never intended to repair or replace the electronic power steering torque assist defect during the relevant warranty periods. To date, GM has not provided

Plaintiff or the Class members with a repair or remedy that will eliminate the electronic power steering torque assist defect.

109. GM owed a duty to disclose the electronic power steering torque assist defect and its corresponding safety hazard to Plaintiff and the Class members because GM possessed superior and exclusive knowledge regarding the defect. Rather than disclose the defect, GM intentionally and knowingly concealed, suppressed and/or omitted material facts including the standard, quality or grade of the Vehicles and the presence of the electronic power steering torque assist defect, to sell additional Vehicles and avoid the cost of repair or replacement.

110. The fact that the Power Steering Assist defect causes Class Vehicles to abruptly lose power is material because Plaintiff and the Class members had a reasonable expectation that the vehicles would not expose them and other vehicle occupants to such a safety hazard. No reasonable consumer expects a vehicle to be designed, manufactured and assembled such that that a defect manifests causing a significant and abrupt reduction of the power steering assist, making turning of the steering wheel difficult.

111. Plaintiff and the Class members would not have purchased or leased the Class Vehicles but for GM's omissions and concealment of material facts regarding the nature and quality of the Class Vehicles and existence of the Power Steering Assist defect or would have paid less for the Class Vehicles.

112. GM knew its concealment and suppression of material facts were false and misleading and knew the effect of concealing those material facts. GM knew its concealment and suppression of the Power Steering Assist defect would sell more Class Vehicles and would discourage Plaintiff and the Class members from seeking replacement or repair of the Power Steering Assist defect. Further, GM intended to induce Plaintiff and the Class members into purchasing or leasing the Class Vehicles and to discourage them from seeking repair of the Power Steering Assist defect, in order to decrease costs and increase profits.

113. GM acted with malice, oppression and fraud.

114. Plaintiff and the Class members reasonably relied upon GM's knowing concealment and omissions. As a direct and proximate result of GM's omissions and active concealment of material facts regarding the Power Steering Assist defect and associated safety hazard, Plaintiff and the Class Members have suffered actual damages in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- a. For an order certifying the proposed classes and appointing Plaintiff and Plaintiff's counsel to represent the classes;
- b. For an order awarding Plaintiff and Class Members actual, statutory, punitive, and/or any other form of damages provided by and

pursuant to the statutes cited above;

- c. For an order awarding Plaintiff and the Class Members restitution, disgorgement and/or any other declaratory, injunctive, or equitable relief provided by and pursuant to the statutes cited above or as the Court deems proper, including the repair of all Class Vehicles, replacement or repurchase of all Class Vehicles, and/or the refund of money paid to own or lease all Class Vehicles;
- d. For an order or orders requiring GM to adequately disclose and remediate the Power Steering Assist defect and enjoining GM from incorporating the defective powertrain into its vehicles in the future;
- e. For an order awarding Plaintiff and the Class Members pre-judgment and post-judgment interest;
- f. For an order awarding Plaintiff and Class Members reasonable attorney fees and costs of suit, including expert witness fees; and
- g. For an order awarding such other and further relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

The Plaintiff and each Class hereby demand trial by a struck jury of all issues triable by right.

DATED: November 21, 2019

Respectfully submitted,

/s/ E. Powell Miller
E. Powell Miller (P39487)
Sharon S. Almonrode (P33938)
Dennis A. Lienhardt (P81118)
William Kalas (P82113)
THE MILLER LAW FIRM, P.C.
950 West University, Suite 300
Rochester, Michigan 48307
Tel: (248) 841-2200
epm@millerlawpc.com
ssa@millerlawpc.com
dal@millerlawpc.com
wk@millerlawpc.com

Nicholas A. Migliaccio
(Michigan Bar No. 29077)
Jason S. Rathod
(Michigan Bar No. 18424)
MIGLIACCIO & RATHOD LLP
412 H Street N.E., Ste. 302
Washington, DC 20002
Tel: (202) 470-3520
nmigliaccio@classlawdc.com
jrathod@classlawdc.com

Daniel E. Gustafson
Daniel C. Hedlund
David A. Goodwin
Mickey L. Stevens
GUSTAFSON GLUEK PLLC
220 South Sixth Street #2600
Minneapolis, MN 55402

Tel: (612) 333-8844
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dgoodwin@gustafsongluek.com
mstevens@gustafsongluek.com

*Attorneys for the Plaintiff and Putative
Class*